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ABSTRACT

Parents and taxpayers should understand Title I of the Elementary and Secondary Education Act so that they can ensure that funds are properly spent, that children who need help most receive it, and that Federal and State laws are followed in distributing and using Title I funds. This booklet is written especially for parent advisory council members and other parents whose children are eligible to receive Title I services. It describes what activities Title I can fund and which children it can help; summarizes the rights and responsibilities of parent advisory councils and other parents under Title I; outlines the local, State, and Federal responsibilities; and briefly outlines the Title I funding process and the procedure by which Title I target areas are selected. Addresses of State Title I ESEA coordinators, a list of other national service or information organizations, and a glossary of terms are also included. (Author/KB)

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TITLE I ESEA: HOW IT WORKS

A Guide for Parents & Parent Advisory Councils

U.S. DEPARTMENT OF HEALTH, EDUCATION & WELFARE
NATIONAL INSTITUTE OF EDUCATION

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Foreword

Title I of the Elementary and Secondary Education Act (ESEA) is the largest Federal aid to education program. It was the first and most important Federal program assigned to the U.S. Office of Education to recognize that economically and educationally deprived school children may need extra help—or what educators commonly call compensatory education—to do well in school.

This book is an effort to see that the title I program works by making sure it is properly understood. The book is written especially for parents serving on title I advisory councils and other parents whose children are eligible to receive title I services.

It is important that parents understand what title I is all about. As members of the advisory council and even as taxpayers, they must see that funds are properly spent, that children who need help most receive it, and that Federal and State laws are followed in distributing and using title I funds.

Public Law 89-10, which includes title I, and its amendments are complicated legal documents. The guidelines issued by the U.S. Office of Education concerning title I include many legal and educational terms. As much as possible, this publication is written in laymen's terms; however, some legal and technical language is used to acquaint parents with the use and meaning of this language. Appended to this book is a glossary explaining these words.

Title I ESEA: How It Works is divided into four parts. The first part of the guide contains the basic information parents need to know about title I—what activities it can fund and which children it can help. The second part summarizes the rights and responsibilities of the parent advisory council and other parents under title I. Helpful suggestions for parents also appear throughout the guide. The third part of the guide concentrates on local, State, and Federal responsibilities under title I; that is, what parents can expect their State or local education agency and the U.S. Office of Education to do. The last part gives a brief account of the title I funding process and how title I target areas are chosen.

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PART I

What Can Title I Do?

Public Law 89-10, the legislation which made title I a fact, did not limit the kinds of services which could be provided with title I funds. The first paragraph of the law, which always gives the reason for and intent of the law, says money will be given to local school districts to meet "the special educational needs of educationally deprived children." Each word of that phrase is important. The word "special" indicates title I funds should not be used to provide regular school services to needy children. In other words, the school district must provide *all* children with their basic education; title I should provide *extra* services. The word "educational" emphasizes the Federal Government's idea that title I should be an instructional, not a welfare program. This does not mean that title I services must be limited to classroom help. Congressional committees studying title I drew up a long list of services which might be provided; the list included many *supportive or auxiliary services,* the terms used to describe aid which is not strictly instructional. Supportive services might include free breakfast, medical exams, dental treatment, and field trips. But because title I is an educational program, these services must be related to some educational need. One section of this chapter goes into the question of supportive services in greater detail.

Title I services are provided as part of a title I project. A *project* is one or more activities designed to meet the special needs of educationally deprived children.

This chapter gives only a small indication of the types of projects financed under title I. The Office of Education has published other booklets, including several detailed case studies of title I projects, which will give parents a more complete picture of the services available under title I. This chapter outlines the kinds of services which title I may pay for and to what extent these services may be provided.

SOME GENERAL REQUIREMENTS

The law itself and the criteria developed for title I by the Office of Education include some basic principles which must be followed in planning a title I project.

The law (section 141) says:

1. Projects must meet the special educational needs of educationally deprived children in school attendance areas having high concentrations of children from low-income families.

2. Projects must be of sufficient size, scope, and quality to give reasonable promise of substantial progress toward meeting those needs.

The first point concerns the selection of target areas as discussed on pages 57-58. "Sufficient scope" implies that more than one service will be offered to needy children. For instance, a child having trouble with reading may not only need remedial instruction, he may also need glasses. The scope of the project should include all services necessary to solve the learning problems planners agreed in their needs assessment were most in need of attention. Quality is a difficult thing to judge, especially before a project actually starts. But parents should be sure that title I projects do not duplicate those that have limited success.

Parents should become aware of successful title I projects. A list of such subjects can be obtained from the State or local title I coordinator.

The criteria also makes some points about title I programs and projects. These include:

1. A title I project should be part of an overall compensatory education program involving the use of resources from a number of programs and agencies.

Most school districts have a number of local, State, Federal, and private agencies serving the same children (or their families) whom title I helps. To be sure that all available help is used and no services are duplicated, it is important for the parent council and school officials to work with representatives of other agencies in planning a title I program. This is especially important in programs where title I is paying for many supportive services. Parents know what agencies provide help within the community; they should be sure these agencies are represented in planning sessions for the title I program. A later section in this chapter discusses some of the agencies which might provide help to title I children.

2. The title I program should support and supplement

the regular school program. Many children who are educationally deprived are not responding positively to the regular school program. The title I program should help these children overcome their learning problems by providing activities that are responsive to the student needs. The regular school program, the title I program, and any other special school programs should be planned together as a total educational package.

3. Program planners must consider providing title I services in summer as well as during the regular school year.

4. Educationally deprived children enrolled in desegregated private schools will have an opportunity to participate in the title I program. This point is discussed on pages 14-15.

The best rule of thumb is to look at what is provided in nontitle I areas of the school district. Any services paid for out of local and State money at a nontitle I school should be available at a title I school without using Federal funds.

Of course, any use of title I funds is dependent on a needs assessment (see page 15): the money should be spent on whatever will be most helpful in correcting children's learning problems.

The criteria also include some guidelines concerned with specific types of title I projects. These will be mentioned in other sections of this chapter.

TEACHING ASSISTANCE

A large portion of title I money is spent on teacher-related activities, such as the salaries of extra teachers and teacher aides, and inservice training for title I personnel.

Title I may not pay the salaries of regular school employees. For instance, title I should not pay the salary of a first-grade teacher just because the children she teaches are eligible for title I services. However, title I funds may be used to hire a second teacher or aide for that same class to provide more individualized attention to identified title I students.

Most teachers hired under title I have specific skills which the regular classroom teacher may not have or may not have the time to use. Many school districts hire remedial reading or math teachers as part of their title I program. Others employ language arts specialists to offer reading readiness to preschool children. Bilingual teachers will be needed for title I students who do not speak English. If these teachers work only with children eligible for title I services and their job is not the same as that of a regular school employee in a nontitle I school, their salaries may be paid for under title I.

Because many schools offering title I services are located in older neighborhoods and housed in old buildings, they sometimes have a hard time getting good teachers. To help correct this problem title I approved the use of Federal money to help get and keep good teachers in title I schools. Teachers receive extra money for teaching in a title I school; this money is called a *bonus payment*.

Most school districts do not include bonus payments in their title I programs. The few that do must show in their application that their title I schools have not been getting the best possible teachers, how more qualified teachers will be found and hired, what training these new teachers will receive, and how the effect of bonus payments on student learning will be evaluated. After 2 years the school district must prove the bonus payments did, in fact, help get and keep good teachers in title I schools.

Thousands of teacher aides now work in urban and rural schools as part of a title I program. These aides assist teachers in the classroom and work with students individually. Title I funds may not continue to pay the salaries of aides in title I schools if these aides perform the same duties as aides in nontitle I schools whose salaries are paid with State or local money.

Parents should be sure the aides employed in a title I program represent the community, and parents themselves, if they apply, must be considered for employment. Much of the success aides have experienced is due to their knowledge of the children's life out of school; they understand the children's background and children sometimes find it easier to identify with and talk to an aide rather than the teacher.

Title I can also cover the cost of training teachers and aides who will participate in the title I program. Title I requires that such training—whether preservice or inservice—"be of sufficient size and depth to have an impact on the participant and the title I program." In other words, one day is usually not enough time to acquaint new teachers and aides with the problems of students participating in a title I project and the objectives of the project. Colleges and universities in or near a title I area should be contacted for help in planning a training program. Local and State personnel who work with the target population can also serve as resource persons.

Title I also requires that teachers and aides be trained together. This encourages closer cooperation among the professional staff members and their aides.

Parents should know what type of training is available to both teachers and aides as part of the title I program and should encourage interested parents to apply for positions as aides.

Another form of teaching assistance common in title I projects is tutorial systems. Tutors, either adults or older students, help children, particularly in reading and math. A tutor usually works with just one or two children. He sometimes accomplishes more simply because the child does not see his tutor as a "teacher." A side effect is that the tutors themselves often learn more.

OTHER INSTRUCTIONAL SERVICES

There are other instructional services not directly related to teaching which can be part of a title I program. Some will not cost any money; others may be a major expenditure.

To get children interested in some subject, school officials may invite some member of the community who uses knowledge of the subject in his job to visit the classroom. For example, a banker might talk about the importance of knowing how to balance a checkbook; the druggist might bring a few chemicals to conduct an experiment in a science class; a storekeeper could explain addition by talking about buying and paying for items in a store; a butcher may get children interested in weights and measures by showing how he uses the scale in his store. Most of these people will volunteer their services to the schools if asked, yet they are an asset to the title I—and the regular school program.

Other services will cost money. Some school districts use title I money for special work-study programs which help point out the importance of education to educationally deprived teenagers.

Title I sometimes covers the cost of a summer school program. Although children may not need to enroll in the regular summer school to make up work in a subject they missed or failed, they may need help to retain and reemphasize material learned during the regular school term. Title I can pay for both teacher salaries and other expenses of such a summer project.

The variety of instructional services is endless. Some will be discussed under equipment and supplies; others are mentioned as examples elsewhere in this book. Parents should know exactly what instructional services are available to children through their district's title I program and should work with school officials to decide whether these services help improve the children's learning achievements.

SUPPORTIVE SERVICES

While certain things, such as medical and dental treatment, clothing, and transportation, are obviously not directly a part of an educational program, educators generally agree these services are supportive. Arguments start when guidance and counseling, field trips, and job placement are considered. Some school officials feel such services are instructional because they may be offered within a school as part of the school program. Others argue that these services are not essential to academic learning and therefore are supportive.

In a sense there is no need to argue the point. Whether these services are instructional or supportive, a needs assessment should show if they must be available for a child to learn.

For instance, a child who repeatedly disturbs the class, is aggressive toward classmates, and appears to be disinterested in class work, may not be able to see properly. An eye examination may reveal that such a child needs glasses in order to function adequately in school. Normally glasses should be provided through the public health service. If there is proof that the glasses cannot be provided through the public health service and there is no other source for securing them, title I funds can be used to purchase eye glasses. Children in an isolated rural community who have never been in a restaurant, visited a zoo, or seen a factory may have difficulty reading because they have no idea what words like cafeteria, waitress, zebra, or penguin mean. City children may never have seen a cow or a pig. Field trips are one way to help children improve their vocabulary and consequently their reading skills.

Since title I is an educational program, it has two conditions which must be met before supportive services can be paid for with title I money:

1. The services are not available from any other source.

2. The services are an important part of the title I educational program.

The first point is pretty clear. Title I should not provide lunches if the school district already has a hot lunch program funded by the U.S. Department of Agriculture. Title I should not buy eyeglasses for children if the local Lion's Club will do this. Title I should not pay for medical exams for children who can receive the exams free as part of the local welfare program. Other sources of services will be discussed later.

For services to be an integral part of a title I educational program, they must be related to an educational need and result in educational improvement. For instance, a young child may not be able to concentrate in school if he has not had breakfast; for him to learn, title I may need to provide a good breakfast. Or children in isolated rural areas may be unable to at-

tend remedial reading classes because they have no way to get there; title I can pay for the cost of transportation.

Only children participating in a title I *educational* program may receive supportive services paid for under title I. For instance, an eligible child may not get breakfast under title I if he is not getting some sort of instruction as part of a title I program. And not every child in a title I program will need supportive services. Such services should be provided on an individual basis; those children who need extra help should get it.

Where To Get More Help

Every time title I money is spent on supportive services there is less money to be spent on education. Title I funds can be spent on nearly anything that will help children do better in school. But instead of spending this money on food, doctors, or clothing, school officials and parents should try to get other organizations to provide these services. Following is a list of agencies that provide help to needy children and their families:

Aid to Families With Dependent Children
Chamber of Commerce
Child Guidance Clinic
Community Action Agency
Comprehensive Community Health Center
Community Coordinated Child-Care Centers
Community Mental Health Center
Dental Association
Elk's Club
Family Service Society
Follow Through
Food Stamp program
Foster Grandparents
Head Start
Job Corps
Junior Achievement
Legal Aid Society
Lion's Club
Local Hospitals
Local Libraries
Medicaid
Medical Associations
Model Cities
NAACP
National Dairy Council
National Welfare Rights Organization
Neighborhood Youth Corps
Public Housing Authority
Red Cross
Salvation Army
Society for the Prevention of Blindness
Teacher Corps
United Fund Agencies
Urban League
Visiting Nurses Association
YMCA
YWCA

Most school districts also get a number of other Federal funds which can be used to provide services to title I children. Under other titles of the Elementary and Secondary Education Act funds are available to buy books and provide library services, try innovative projects, plan programs for bilingual students, and operate special projects for dropouts. The U.S. Department of Agriculture gives money to school districts to provide free or reduced price lunch and breakfast programs for needy children. There are other Federal funds, too. Parents should talk to local representatives of national programs and write their Congressmen to find out what help title I children can receive.

A number of States fund their own compensatory education programs. These can be used to serve more children than title I alone might be able to reach or to provide more services to children already receiving help under title I. Parents and school officials should also look at other State programs—health, employment, or education—which might be of help to title I children.

There are many nongovernmental resources at the local level beyond the agencies listed on the previous pages. Universities and colleges may have special clinics title I children can use; students can act as aides or tutors in title I schools; professors are always good for ideas on where other help can be found. Local businesses and industries may offer their own community help programs. And community service agencies—the welfare department, police and fire departments, and the health department—have a variety of services for all residents. Parents should know what these services are and be sure the title I program takes advantage of them.

The important thing to remember about all these sources of help is to make the fullest possible use of them. Planning for a title I program should include consideration of all local, State, Federal, and private programs which can provide more services for title I children. Title I funds should be used primarily for education and for supportive services only when no other sources can provide such help.

Supportive Services for Migrant Children

Migrant families (see page 13) most often do not meet the residency requirements of State and local health and welfare programs. Most communities require citizens to live there a minimum of 6 months to

receive the benefits of such programs. But migrant children and their families are often in one State for only weeks at a time. Therefore, they cannot get the benefits of such programs and extra services. Title I may have to pay for such things as medical and dental care, food programs, and day-care services.

However, there is another source of money to help these migrant families—title III of the Economic Opportunity Act of 1964. Part B of this law provides special help for migrants, and school officials planning a title I program should know about this law and make sure its benefits are used.

EQUIPMENT AND CONSTRUCTION

Title I includes some special rules for projects using title I money to buy equipment or build or remodel buildings. This use of title I money occurred more in the first years of the program than it has in recent years.

Federal regulations relating to equipment and construction include the following requirements:

1. Expenditures for equipment will be limited to the minimum required to implement approved title I activities or services.

2. Title I funds will be used for construction only when necessary to implement projects designed to meet the highest priority needs of educationally deprived children.

The word equipment should not be confused with supplies. *Supplies* are consumable goods; that is, materials that once used must be frequently replaced. They are not meant to last for long periods of time. Most school programs use a large number of supplies, such as crayons and pencils, workbooks, et cetera. *Equipment*, on the other hand, is more expensive and is meant to last for a longer time. Some examples of equipment commonly found in schools are television sets, film and slide projectors, overhead or opaque projectors, tape recorders and earphones, and Language Masters. The law defines equipment as including "machinery, utilities, and built-in equipment and any enclosures or structures to house them, and includes all other items necessary for the functioning of a particular facility as a facility for the provision of educational services, including such items as instructional equipment and necessary furniture, printed, published, and audiovisual instructional materials, and books, periodicals, documents, and other related materials."

Federal regulations relating to equipment include other requirements:

1. The title I program, as planned, requires the use of equipment that is essential to the success of the project. For instance school officials may agree a reading lab, where children can work on their reading problems individually and at their own pace, is the best way of solving the children's reading problems. To organize such a lab, they will need to buy tape recorders, earphones, a monitoring system, etc. Such equipment is necessary to carry out the title I project.

2. The school district must show that there is a need for such equipment. For example the school district does not have such equipment now, either for its regular school program or other title I projects.

3. The school district must show how the equipment will be used. For instance the school district has staff members who can (or will be trained) to use the equipment. This is especially important because some of the new teaching machines are complicated and repairs are costly.

These are requirements relating to the use of equipment in title I projects involving children from non-public schools, especially when such projects operate on private property. The public school district owns all equipment purchased with title I money. The public agency shall keep records of all equipment, account for its location, and make sure that the equipment is being used for the purpose of the title I project. The public agency may put the equipment in a non-public school for use in a title I project, but the non-public school may not keep the equipment. Any equipment used for a title I project in a non-public school must be mobile or portable so it can be removed or carried away; it cannot be equipment built into the school. And public school officials must keep track of all equipment being used in non-public schools; they promise to do this in their title I application. Although title I money may be used for construction, Federal officials discourage this use.

The law defines construction as "the preparation of drawings and specifications for school facilities: erecting, building, acquiring, altering, remodeling, improving, or extending school facilities . . ." To use title I money for construction, the school district must show in its application that there is no good place available to bring children together for a title I project and that the school district cannot pay for construction. In the few cases where construction is approved, the school district must promise to begin and complete the building in a reasonable period of time, to pay laborers the going rate for their work, and to follow the Secretary of Labor's guidelines on construction using Federal funds.

Among the things the Secretary of Labor requires are:

1. Firms hired to do the construction (the contractors) may not discriminate in their employment practices. In other words, they must give qualified blacks, Puerto Ricans, and other minority members an equal chance to do the job.

2. There must be open competitive bidding for the construction. This means that any firm which wants to must be given a chance to estimate the cost of construction. Usually the firm with the lowest estimate will get the contract.

3. Whatever is built must be functional and economical; not extravagant and elaborate.

COMPARABLE SERVICES

No matter what services a title I program provides for educationally deprived children, they will not be enough to help these children overcome their learning problems if they are not *extra* services. Title I funds are meant to be used in addition to State and local funds, not instead of them.

This was always the intent of title I, but because some schools usually received less services from State and local funds than other schools in the same district, the Federal Government has made its rules on providing equal or similar services to children in title I and nontitle I schools stronger and more clear.

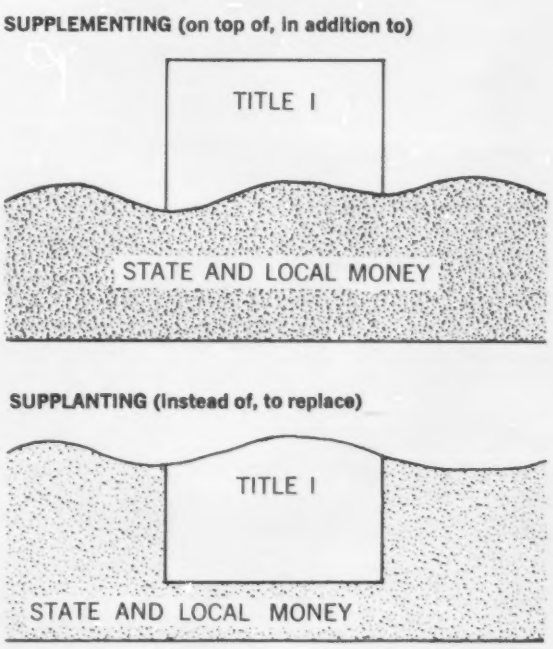
The first regulations issued about title I stated that this Federal money should be used to supplement and not supplant State and local funds. *Supplement* means on top of or in addition to; *supplant* means to replace or instead of. Figure 1 illustrates the meaning of these words.

In 1970 Congress took another step toward equalizing services by making *comparability* part of the title I law. Public Law 91-230 says State and local funds will be used in each school district receiving title I money "to provide services in (title I) project areas which, taken as a whole, are at least comparable to services being provided in areas in such district which are not receiving funds under this title (I)." Beginning July 1, 1972, a school district which could not prove it was offering comparable services to children in title I and nontitle I schools could not get title I money.

Public Law 93-380 provides that the school district may exclude from comparability determination the number of children enrolled on a full time equivalency basis in special education and/or bilingual classes. In addition, staff serving these students may be excluded as well as salaries of these staff.

The Federal regulations provide that the State education agency shall suspend approval of a title I project for the entire district when a school is determined not to be comparable after December 1st. This suspension will be in effect until comparability has been achieved. No title I funds may be used during a suspension period, and the project is disapproved as of December 1 if no satisfactory comparability report is submitted by March 31.

FIGURE 1.—The Meaning of Supplementing vs. Supplanting.


SUPPLEMENTING (on top of, in addition to)
TITLE I
STATE AND LOCAL MONEY
SUPPLANTING (instead of, to replace)
TITLE I
STATE AND LOCAL MONEY

School districts must show whether services provided with State and local money are comparable in title I and nontitle I schools. They are comparable if:

1. The number of children enrolled per instructional staff member (including both certified and noncertified personnel) for each title I school is not more than 105 percent of the average number of children per instructional staff member in the entire district. Instructional staff members include teachers, principals, librarians, guidance counselors, and aides, and

2. The amount of State and local money spent on each child enrolled in a title I school is not less than 95 percent of the money spent per child in all nontitle I schools in the district.

If a school district has even one school that is not comparable on either of the above criteria, it must collect and report data on instructional materials and supplies for the entire school district. Each title I school must then be comparable on all three criteria: ratio of pupils to instructional staff, per-pupil expense

for instructional salaries, and per-pupil expense for instructional materials and supplies.

School districts must compare the schools in a maximum of three groups – elementary, junior high, and high school. School districts providing education at all grade levels (K-12) may use all three groups. In instances where grading arrangement differs from the traditional elementary-junior-senior high pattern the following guidelines will apply. Those districts providing education at seven or fewer grades above kindergarten (K-5 or 6) are limited to one group. Districts providing education at eight or nine levels above kindergarten may use a maximum of two groups. In instances where education is provided at grade levels from six or seven to twelve, two groups may be used. Those districts providing education at four levels or less between grades six and twelve are limited to one group. Schools that serve grades in two or three groups must be included in the group with which they have the most grades in common.

Table 1 is a checklist parents can use to determine if their school district offers comparable service to title I

TABLE 1.—Checklist for Parents To See if Their School District Offers Comparable Services to Title I and Nontitle I Schools

(DO NOT INCLUDE STAFF MEMBERS WHOSE SALARIES ARE PAID WITH FEDERAL MONEY)

School District . . . . . grade span of schools listed . . . . . .

Data		Title I school	Average for nontitle I schools
1.	Number of pupils enrolled		
2.	Number full-time instructional staff		
*3.	Ratio of pupils to full-time instructional staff (divide #1 by #2)		
4.	Amount spent on instructional salaries		
5.	Amount spent on instructional salaries (not including seniority pay)		
*6.	Per-pupil expense for instructional salaries (divide #5 by #1)		
7.	Number of children enrolled in special programs (excluded from comparability determination)		
8.	Number of instructional staff employed in special programs (excluded from comparability determination)		
9.	Amount spent on instructional salaries in #8		

*These are the criteria necessary to decide if your district meets the Office of Education's comparability requirement. Remember, there may be a 5-percent variation.

and nontitle I schools. School officials should provide parents with the data needed.

A separate checklist should be filled out for *each* title I school. The data should be easy to get because school districts have to submit them to the State education agency by Dec. 1st. These data must be broken down for schools serving the same grade levels; for instance, elementary schools should be compared with each other. It would be unfair to compare the average per-pupil expenditure of an elementary and secondary school.

The comparability law allows some differences among schools because it is impossible to keep everything absolutely equal. It does not say that every school must offer the same services; one school may need a remedial reading teacher while a bilingual teacher may be more important in a second school. The law does not say that every school has to use the same kinds of books or the same amount of supplies. What the law does say is that every school must get its fair share of State and local funds for education. In one school district, the Office of Education found the average amount spent on each student in a nontitle I elementary school was $495. In a title I elementary school in the same district the average expenditure for each child was $295. That is not fair. No matter how much help title I is able to give needy children in the second school, it will only make up for what children in the first school already get. There is nothing *extra*, and the whole purpose of title I is to provide extra services for educationally deprived children.

Parents and other citizens pay the State and local taxes used for the schools. They should be sure the schools their children attend get as big a share of this tax money as other schools in the district. If they do not, parents should complain to the State education agency.

The State has a number of responsibilities concerning comparability. It must:

1. Require and study comparability data and plans submitted by local school districts.
2. Require that local school districts promise to maintain comparability.
3. Temporarily withhold the approval of a title I application or the payment of title I funds to a school district which does not meet the comparability criteria.
4. Monitor local school districts to be sure comparability data are accurate.
5. Submit reports on comparability to the Office of Education as requested.
6. Check into parents' complaints about a lack of comparability between title I and nontitle I schools.

APPLYING FOR TITLE I FUNDS

Before the SEA gives title I money to a local school district, it must approve the district's title I application. The application is a legal document outlining how the district planned its title I program and how that program will be operated. A school district must submit a new title I application each year. Each State designs its own application, but certain items must be included. They are:

1. Evidence of *maintenance of effort*. In other words, a school district must prove that it is continuing to support title I schools with State and local funds as much as it did before title I money was available.
2. Data indicating children in title I schools receive their fair share of services and staff provided with State and local money. (See pages 8-10 for a discussion of *comparability*.)
3. Data to support the selection of *eligible attendance areas*, that is, those areas with higher numbers or percentages of children from low-income families than the LEA average. (See page 56.)
4. Needs assessment data. (See page 15.)
5. Description of the involvement of nonpublic school children. (See pages 14-15.)
6. Description of parental involvement. (See pages 21-32.)
7. Description of the project. This should include a title for each project, an explanation of the educational problems to be solved, how participants were selected, objectives for the project which can be measured in terms of student performance, a description of how the project will operate, an evaluation design, plans for inservice training of staff members, and an itemized budget. A district's title I program may include several projects.
8. Plans for disseminating information about the title I program. This includes keeping staff members, parents, the general public, and State and Federal officials informed about title I activities.
9. Budget summary.
10. Equipment inventory. This is especially important in school districts where some title I activities will be held at desegregated private schools.

The LEA must also promise in the application to control all title I funds, to own all equipment purchased with title I money, to submit an annual report and any other reports requested to the SEA, and to prevent discrimination in title I activities.

Thus, although the application is part of the funding process, it is also an essential element in the planning and operation of a title I program. The SEA not only uses the application to determine if a school

district receives title I funds, it also uses the application to monitor local title I activities; that is, to be sure the program is operating as it was planned.

Each parent advisory council should receive a *free* copy of a district's title I application before it is forwarded to the SEA. This should be done in plenty of time to allow council members to comment on the application. In addition, anyone else who wants to see the application should be given the opportunity to do so. Parents' comments, if not included in the application, should be sent to the SEA along with the application.

In examining a title I application, parents should consider at least the following questions:

1. What information was used to select attendance areas where title I services would be offered? Are these data the best indicators of where the most needy children live and attend school?

2. Did the school district officials consult parents and community agencies serving the target area about the needs of eligible children?

3. What criteria were used to consider who of the eligible children would actually participate in the title I program?

4. Could any other State or local agency, either private or public, provide any of the services included in the title I program?

5. Do schools with title I services receive the same amounts of State and local assistance as nontitle I schools in the district?

6. Who designed the title I program? How were parents involved?

7. Can the goals of the program be measured objectively?

8. Are any noninstructional activities included in the program? If so, will they have a direct bearing on educational performance?

9. Does the title I program differ from the regular school program? Are they complementary?

10. Are teachers and teacher aides trained together? Is their training adequate?

11. Are nonpublic school children going to participate in the program?

12. How much information do parents have about title I activities in the district?

SEA staff members will be asking themselves many of these same questions in examining local title I applications.

Whom Can Title I Help?

The question of whom title I can help is complicated by the use of different criteria for the selection of schools which will participate in the title I program and children who will actually receive title I services. The selection of participating schools, as discussed on page 56, is based on the number or percentage of poor children living in the neighborhood served by certain schools. Once some schools within a district have been chosen as title I schools, the only criteria for participation of children are that: (1) They reside in an attendance area served by a title I school; and (2) they be educationally deprived. An educationally deprived child is one who is behind in school. He (she) needs special instructional help to perform at the grade level appropriate for his age. The children's special educational needs may result from poverty, neglect, delinquency, physical handicaps, or cultural, economic, ethnic, or linguistic differences from the traditional student body.

Thus, participation in title I programs is *not* restricted to poor children, although the selection of participating schools, based on low-income factors, insures that a large number of participants will be poor.

In considering whom title I can help, it is important to realize that there are many more children who need and are eligible for title I services than most school districts can serve. Therefore, districts must concentrate their funds on the most educationally needy children. This principal of *concentration* will be discussed more thoroughly in this chapter.

There are special categories of children to be considered for title I services. Children in institutions for the neglected, delinquent, or handicapped, migrant children, Indian children, and children attending nonpublic schools are all eligible for title I services, but their participation in title I programs involves certain problems this chapter will cover in greater depth.

GENERAL ELIGIBILITY OF CHILDREN

The statement of purpose for title I, contained in Public Law 89-10, makes it clear that the program was meant to serve educationally deprived children living in low-income areas: "To provide financial assistance to local educational agencies serving areas with concentrations of children from low-income families to expand and improve their educational programs by various means which contribute particularly to meeting the special educational needs of educationally deprived children."

Basically, there are two criteria a child must meet to participate in a title I program:

1. He must live in the title I target area. This does not mean he must attend the public school where title I services may be offered; but he must be a resident of the area served by the public school.

2. He must be educationally deprived. Most school districts consider a child educationally deprived if he is performing below the expected grade level for his age group. For instance: a 6-year-old should be doing first-grade work; a 9-year-old, fourth-grade work.

Like all federally financed projects, title I forbids discrimination against any child because of race, color, sex, or national origin. The application submitted by each local school district must include an Assurance of Compliance with title VI of the Civil Rights Act of 1964. Title VI prohibits discrimination in any activity receiving Federal aid.

In counting children in order to determine a school district's title I grant, only children aged 5 through 17 are included. However, children below age 5 and above age 17 may receive title I services; only educationally deprived student in an elementary or secondary school with a title I program may receive title I help. For instance, a school district may organize a title I project for preschool children or fund a dropout prevention project for youths up to the age limit prescribed by the State for receiving free public education.

SPECIAL CATEGORIES OF ELIGIBLE CHILDREN

Soon after title I became law, it was amended to include aid for handicapped children living in State-

operated institutions. A year later Indian and migrant children and children living in State or local institutions for the neglected or delinquent also became eligible for title I services. Parents of these children should also be involved in title I activities.

Indian Children

The title I program for Indian children living on Government reservations is run by the Bureau of Indian Affairs (BIA), a part of the U.S. Department of the Interior. The BIA acts as a State education agency in supervising the title I program. It approves the title I applications of BIA schools, monitors the title I programs, and handles complaints related to the program.

The BIA has signed a memorandum of understanding with the U.S. Office of Education agreeing to obey all title I rules. Every parent council at a BIA school and every head of a school should have a copy of this memorandum.

The title I program for Indian children should not be very different from any other title I program in terms of its administration because it must still follow all Federal laws and regulations. It must involve parents, study the needs of eligible children, plan projects to meet those needs, and include a detailed budget.

But a program for Indian children *should* differ from other title I programs in content. It should consider the different cultural and sometimes linguistic background of the students. It must examine the limited environment of the reservation and consider the necessity of planning field trips to expose students to different educational experiences.

School districts with Indian populations must be sure the parents of Indian children receiving title I services are represented on parent advisory councils.

Parents of children attending Federal schools on Indian reservations are usually close because they live on the reservation year-round. However, parents of children attending BIA schools away from home will find it harder to become involved in title I activities. Nevertheless, their opinion must be considered in planning the title I program.

Many Indian children no longer live on reservations but have moved with their parents to large urban areas. If these children live in an attendance area where title I services are available, their special needs should be examined in planning the local title I program.

Migrant Children

A *migrant child* is one who has moved with his family from one school district to another during the past year because a parent or other member of the family picks crops, is a fisherman, or works in other food processing activities. By law, a child is considered a migrant up to 5 years after his family has left the migrant stream.

There are two types of migrant children—interstate and intrastate. An *interstate migrant child* is one who within a year's time moves from one State to another with his family to find agricultural work. An *intrastate migrant child* moves to another school district but stays within the same State. Both intrastate and interstate migrant children are eligible for title I services.

Most States have a large population of migrants for only 1 to 4 months each year, during harvest season. In these areas the involvement of the migrant children in regular title I activities is not always feasible, but there should always be a State-operated migrant program to assist them.

Three States—California, Florida, and Texas—have large migrant populations for most of the year, so there is a real need to look at the special educational problems of these migrant children in their home base setting. They may not only receive title I services under the special grant made to each State education agency for migrant education but also are eligible to participate in local title I activities if they are educationally deprived. Their needs, including remedial help, bilingual instruction, prevocational training and counseling, and preschool, should be considered in planning the local title I program in the districts where they live for most of the school year.

Local parent advisory councils in these States should make a special effort to have migrant parents represented on the local councils. Local parent councils in other States where migrants live only a short time can involve migrant parents in several ways. Council members and local school officials may talk with the parents to get a better understanding of their children's educational problems and needs for future planning of title I programs. Council members can tell them about what title I and other community services are available and encourage them to attend the council meetings.

The title I program serves nearly 430,000 migrant children each year, but there are still thousands of such children who are not receiving special educational help. Parents should make a special effort to see that migrant children receive services under the Provi-

sions of the Migrant Program and, where possible, are included in all title I activities of the school district.

Children in State Institutions

All children living in State institutions for the handicapped, neglected, or delinquent and participating in an elementary or secondary education program are eligible for title I services. The State education agency (SEA) receives separate allocations for handicapped children and neglected or delinquent children in State-operated institutions. The SEA then grants this money to the State agency responsible for the administration of such institutions when its project application is approved; this State agency acts as a local school district in planning title I programs to meet the needs of institutionalized children.

Children in locally operated institutions for the neglected or delinquent should be helped as part of the local school district's title I program. Since their problems are likely to be different from those of children attending regular schools, special attention should be given to discovering their needs.

Because children in institutions are away from home, it is hard for their parents to be involved in school activities. In many cases, these children are wards of the State, and contact with the parents is minimal. However, there are things that can be done to involve these parents. For example, when parents visit their children, title I staff members should try to explain the title I program to them, ask their opinions of it, and find out what they feel are their children's greatest needs. If talking with parents is impossible, the title I staff should try to find out as much as possible about the children's home environments by talking with caseworkers, examining records. This is a necessary part of the needs assessment, and would also be helpful in determining whether family influence would affect academic achievement.

Contact with the parents will be particularly important when institutionalized children return home. Many of them will be eligible for title I services in their local schools, but their needs may be different from those of other children. Parents can help teachers and administrators understand their children's readjustment problems, alert them to particular needs the institution may have noticed, and help plan a school program which appeals to the child. Foster parents can fill this same role.

ELIGIBILITY OF NONPUBLIC SCHOOL CHILDREN

Title I funds may *not* go directly to any nonpublic school. However, children attending desegregated nonpublic schools may receive title I services. In fact, title I requires that such children—if they live in an eligible attendance area and are educationally deprived—be given "genuine opportunities" to participate in the title I program. Thus, the requirements for children attending nonpublic schools are the same as those for children in public schools:

1. They must be educationally deprived.
2. They must live in a title I target area.

Most school districts have rules saying that children living in a certain area must attend a certain school; these areas are called school attendance areas (see page 53). All children thus live in some school attendance area. If the area they live in is picked as a title I target area, then children in that area who are educationally deprived may participate in the title I program, whether or not they attend the public school.

Some school districts have a "freedom of choice" plan which allows a child to attend any school he chooses. There are no exact attendance areas based on neighborhood boundaries. In such cases it is hard to determine what public school children from nonpublic schools might attend, and title I planners must establish rules for determining which nonpublic school children are eligible for title I services. Parents should know what these rule are.

Some nonpublic school children who live in one school district attend a nonpublic school in another district. If they live in a title I target area and are educationally deprived, these children are still eligible for title I services. Planners from both school districts must get together to be sure such children receive help.

School districts must spell out their plans for including nonpublic school children in the title I program in their title I application. They must know:

1. What arrangements have been made to include nonpublic school children.
2. The number of eligible nonpublic school children who will participate in the title I program.
3. How these children will receive services.

Because most school districts have little information about children attending nonpublic schools in the district, teachers and principals from nonpublic schools must be asked to determine what children need help and what types of help are needed most. Parents of nonpublic school children should also be consulted.

Federal regulations for title I require that all eligible children whether they attend public or private schools, receive comparable services under title I. This does not mean that all children will receive the *same* services. If the public school system offers a good remedial reading program, there is no need for the title I pro-

gram to duplicate it. However, children attending nonpublic schools may not have access to a remedial reading program and that may be their greatest need. The school district may offer a title I remedial reading program for nonpublic school children and a remedial math program for public school children. Such services are comparable. Offering a comprehensive remedial math program for public school children and a few field trips for nonpublic school children would not be comparable.

The Federal regulations saying nonpublic school children must be given "genuine opportunities" to participate in title I programs also means they must have a real chance to make use of the services. For instance, projects should not be planned at times and places that would make it impossible for nonpublic school children to attend.

In those cases where a school district is prevented by law from providing services to children enrolled in private schools, the U.S. Commissioner of Education may set up a Bypass. He may also do this if he finds that a school district has failed to provide services for nonpublic school children on a basis equal to that of public school children. A Bypass means that the Commissioner has arranged for services through some other agency and supports those services with funds taken from the amount of money set aside for the school district concerned.

It is not enough to say that enrollment in title I programs is "open" to nonpublic school children or that provisions are being made to include nonpublic school children. A school district must spell out in its application exactly how these children will receive title I services. Some of the most common methods used are:

1. *Dual enrollment.* Under this method the nonpublic school children attend public schools part time to take part in special projects or activities.

2. *Shared services.* In this method the public school system shares its title I staff and/or equipment with title I children attending desegregated nonpublic schools. A public school teacher or special personnel, e.g., speech therapist or guidance counselor, may work with children in the nonpublic school.

3. *Mobile services.* The school district may use a mobile unit, equipped with special materials and personnel, to provide title I services to public and nonpublic school children. In this way, the public school employees are not teaching on private school property.

Parents will find it helpful to read the Office of Education's *Handbook on the Participation of Nonpublic School Children in Title I ESEA* for a more in-depth view of this part of title I.

FINDING OUT WHAT ELIGIBLE CHILDREN NEED

It is not enough to know which children are eligible to receive help with title I funds. For a title I program to be successful, planners (including parents) must know what kinds of problems the children have, which children have which problems, what can help correct the problems, and which problems must be dealt with first. This process is called a *needs assessment.*

The law implies that each school district will do a needs assessment—

> to expand and improve their educational programs by various means (including preschool programs) which contribute particularly to meeting the special educational needs of educationally deprived children.

That's why in outlining the steps to be completed in designing a title I program, Federal officials specifically required a needs assessment in each school district's title I application. The criteria for title I include:

> The application shows that the title I program is based on a consideration of the relative needs of children at all ages and grade levels and is designed to meet a limited number of high priority needs which cannot be met through the regular school program or other programs.

Six steps make up the needs assessment process:

1. Reviewing existing data on educational deficiencies of children who live in the eligible attendance areas.
2. Classifying the needs of various groups of children.
3. Identifying potential participants who live in the project areas.
4. Collecting data on children most in need of services.
5. Diagnosing what the educational problems are.
6. Establishing priorities by grade level and category of need.

Reviewing Existing Data

The first step in the development of a title I program is to review and make some judgements from the existing information about educational deficiencies of children who live in the eligible attendance areas. Information on students' progress in the regular school program will help show how far behind they are. The evaluation of the previous year's title I program often provides considerable information about the educational deficiencies of children in the area where title I projects have been conducted. Special attention should be given to information available on educational retardation, results of educational tests, racial isolation, welfare and nutrition, physical and mental handicaps, and other pertinent information on which the incidence and severity of the needs of children in the eligible attendance areas can be established.

It is essential that public and private school teachers, other staff members, representatives of related programs and agencies in addition to parents of children in the project be involved in the early

stages of planning the program and in discussions concerning the needs of children in the various eligible attendance areas. They are often able to confirm or offer insights concerning the evidence of educational deficiencies. They will be much more likely to lend support to a program of special educational services if, as a result of their involvement, they understand the basis on which such a program is planned.

Classifying the Needs of the Children

It is then necessary to classify the needs of different groups of children. School officials should list the needs of preschool children, children in grades one through three, children in grades four through six, junior high school students, senior high school students, dropouts, and children in local neglected and delinquent institutions. Within each of these groups, there are special categories of children whose needs must be considered -- Spanish-speaking children, nonpublic school children, migrant children, and handicapped children. The objective and subjective information already available within each school district will provide school officials this first data base for determining what children are educationally deprived.

Identifying Potential Participants

The previous sections in this chapter talked about the eligibility requirements for children participating in title I programs. The major criterion is that the child must be educationally deprived, no matter what the cause of that deprivation. To identify which children are educationally deprived, the school district must decide how to judge educational deprivation. The most common standard is grade-level achievement; a child who does not do the work expected of a student his or her age and grade is considered educationally deprived.

To determine which children in the project areas are not performing as well as their classmates, a school district can use a number of sources, including achievement records, reading levels, and standardized tests.

The school district should choose one of these sources as a "key indicator," or the most important guide in the selection of children with learning problems, and apply it to children at all ages and grade levels. For instance, the key indicator may be reading levels. For children in grades one and two, anyone reading 6 months or more below the classroom might be considered educationally deprived; in grades three to six, the criteria might be 1 year or more below grade level; in grades seven to twelve, 2 or more years. While the degree of difference between the norm and the performance level of an educationally deprived child may change, the indicator -- reading level -- remains the same. Percentile scores on standardized tests may also be used as a measure of performance level.

Collecting Data on Children Most in Need

Knowing that a child is educationally deprived does not tell program planners anything about the child's learning problems, the causes of those problems, or his or her needs. At this point, it is necessary to consider the child as an individual, not as part of a group. For instance, a first-grader's problems and needs are different from a ninth grader's; a Spanish-speaking child has problems in school an English-speaking child does not have; institutionalized children may have different problems than children who live at home.

At this point it will probably be necessary for schools to gather both objective and subjective information on the previously identified educationally deprived children. This information will allow the identification of those children most in need and therefore those who will actively be selected for participation. The objective data will include academic, health, and attendance records and information about the child's family, their income, his neighborhood, et cetera. The subjective data usually comes from talking with persons who know the child -- teachers, parents, social workers, neighbors, doctors and nurses, and others in the community. Parents should be sure their opinion is considered in determining the problems and needs of their children.

In large urban school districts, it may be difficult to gather information on each educationally deprived student without a computer. However, each child's school records should give some indication of his education needs. In such cases, parents should make sure that individual children with problems similar to those of other children are studied as part of the needs assessment.

Diagnosing Educational Problems

The data will give title I program planners a good indication of what a child's problems are and the causes of such problems. For instance, school records may show a child has difficulty reading. In talking with the mother, a school official may find out the child often falls over things, misjudges distances, and

so forth. Then a doctor may confirm that the child needs glasses and probably can't read without them.

In pinpointing a child's educational problems and what causes them, the parent council and school officials must think about the child's academic skills (reading, vocabulary, listening, speaking, arithmetic), his attitude toward school, his motivation, his physical and mental health. They must compare the child's progress in these areas with the average for his age and grade level.

Establishing Priorities

The previous sections in this chapter talked about eligible children, but there are always more eligible children than the district can serve with its title I money. So title I funds are used to help the most needy of the eligible children; this is called concentration.

Concentration insures that title I funds are not spread so thin that they do not make a difference. This money is above and beyond the money spent on the child as a part of the regular school program. Of course, the dollar amount will vary considerably from State to State. States with their own compensatory education program may be able to serve more children (with lower per-pupil expenditure) under title I because the State provides extra services. Education costs, such as teacher salaries, school construction, and transportation, will be lower in some States than in others. But each State must be sure its local school districts concentrate their title I funds enough to be sure the money has positive effect on student achievement.

In order to concentrate its title I money on a limited number of the eligible students, a school district must establish priorities for the use of title I funds. Some States have set priorities for their school districts by limiting the use of title I funds to elementary schools; this means the needs of students in grades seven to twelve are not even considered in the needs assessment.

First priority should be given to the most widespread and most serious problem discovered in the area of basic skills. In many school districts this will be reading. But reading is still a very broad priority, and a school district may not have enough title I funds to help all children with reading problems. Therefore, as one example it may set first priority on preschool reading readiness and/or serving those children in the elementary grades who are 2 years or more below grade level. Program planners must then identify the number of children that will be served and where the services will be provided; then they identify the participants.

Once these priorities have been established, a school district begins to plan how the most important needs of this limited number of children can be met.

But before dealing with that question, parents should examine the entire needs assessment process to be sure the children the title I program will serve are the most needy and that their problems can be solved. Parents must ask:

1. What was the "key indicator" used in identifying educationally deprived children? Is this the best indicator?
2. Were the needs of special categories of children; e.g., Spanish-speaking, migrant, handicapped, dropouts, etc., considered?
3. Were parents asked what they thought the children's needs were? Were other members of the community asked?
4. How many children in the target area are educationally deprived? How many will actually participate in the title I program? Is this too many? Too few?
5. Did school officials consult representatives of nonpublic schools?
6. How did the school district decide which were the worst educational problems of the children and what help the children needed most?
7. Do parents and teachers agree that this is the worst educational problem?

PART II

What Can (and Should) Parents and Private Citizens Do Under Title I ESEA?

This entire book is for the parents of title I children, explaining the program to them and pointing out certain areas they should be particularly concerned with. This chapter deals with parental involvement more directly—what the law says about involving parents and other citizens in the title I program, the purpose of parent advisory councils, and the ways in which parents and other community members can get involved in school activities.

Parental involvement is nothing new in title I. Within a year of the time title I programs first started in 1965, Public Law 89-750 amended title I by requiring school officials to work with local community action groups in developing and operating title I projects. These groups often included the parents of title I children.

When the revised criteria (Program Guide No. 44) were issued for title I, they included a number of recommendations concerning parents and other community members. For instance:

1. School officials should talk with parents in determining the most important needs of children eligible to receive help under title I.

2. Parents and other qualified community members should be considered for job openings in the title I program.

3. The title I program should include activities and services which will involve parents.

4. Both parents and other interested citizens should be kept informed about the title I program.

On July 2, 1968, Program Guide No. 46 suggested that local school districts establish advisory councils for title I. Three years later districtwide parent advisory councils became a requirement for title I. The 1971 Federal regulations on parental involvement, requiring *parent councils*, replaced Program Guide No. 46.

On August 21, 1974, Public Law 93-380 extended parent participation by requiring that both districtwide and school councils be formed.

This chapter examines the types of parental involvement, concentrating on the role of the parent advisory council. Parents will also want to read *Parental Involvement*, a guide for State and local school officials published by the Office of Education. It explains the duties of the State and local education agencies in regard to parental involvement. The Head Start workbook, also called *Parental Involvement*, offers suggestions on activities for parents, the organization of parent groups, and tips on planning and conducting meetings. The workbook should be available from local Head Start projects or the Office of Child Development, 400 Sixth Street SW., Washington, D.C. 20013.

THE ROLE OF PARENTS IN TITLE I PROGRAMS

There are many ways in which parents and other citizens can become involved in title I and other school activities. This chapter describes just a few of them.

Parents as Community Members

Parents of school-age children probably know more about what is going on in the schools than other citizens. As taxpayers, they are concerned with how their tax money is being spent. They should make their views known when the school district asks for more money or when there are school board elections. Their opinions, because they are more closely involved with the schools, are likely to influence the votes of other community members.

Other citizens come in contact with the schools by living near them, by hiring a student, or just by

reading about them in the papers. Their impressions may be good or bad, depending on their experiences. Parents, especially those who are really involved in school activities, can help improve school-community relationships. They understand their neighbors' attitudes but, at the same time, know what problems the schools have.

Parents as Helpers

Parents and other citizens have many talents. They should work with title I staff members in using these talents to help the schools. There are some salaried positions in most school districts which parents may fill. Of course, the first to come to mind is the teacher aide.

Title I funds pay the salaries of many aides throughout the country. Title I aides, however, can be used only under certain conditions. Their services must be given only to those children who are identified and who are receiving title I services. Therefore, they can be assigned only to teachers paid by title I funds and who are serving this special group of students. The aides have been successful in helping lessen the amount of teachers' paperwork, in giving more individual attention to children, and in gaining the confidence of children from backgrounds like those of the aides. In fact, title I aides have been so successful that many school districts now hire more aids with their own money. Title I funds may pay the salaries of aides if their services are needed in the title I program and if the school district does not have similar aides in nontitle I schools whose salaries are paid with local funds.

There may be other jobs that community members would be best suited for. Albuquerque, N. Mex., hired a number of citizens to administer a simple Language Dominance Test. After evaluators trained them for several hours, they went into the homes of school children to find out how much Spanish or English was spoken in the home. This helped school officials decide how much bilingual instruction students would need.

Parents are most often seen in the schools in a volunteer role. They may offer to supervise field trips for the children. They may help keep order in the lunchroom and on the playground. They may prepare snacks occasionally. They may give a demonstration that is tied into a classroom lesson. For instance, a meter man for the gas or electric company might explain his job as a way of showing children the importance of arithmetic. The local weatherman could be invited to talk to a science class. A news reporter could give an English lesson to older students. Of course, the traditional bodies, such as the parent-teacher asssociation and the home and school associations, are still active in many places. They give the schools both financial and personal help.

Parents as Observers

As parents become more involved in title I, they will want to know more about the program. Parents can visit classrooms for firsthand information, talk with teachers, principals, and school officials, and exchange ideas with other parents. Parents may want to read through a district's title I files. (These should be open to the public.) Title I rules require that parents be given an opportunity to look over and give their opinions about a district's title I application.

Remember, the children come first. Try to find out if they are getting what they need. In a sense parents should be looking for many of the same things Federal and State staff members examine when they monitor title I activities.

These are some of the ways individual parents and citizens become involved in school activities. Some of these same tasks must be assumed by members of the school district's parent advisory council.

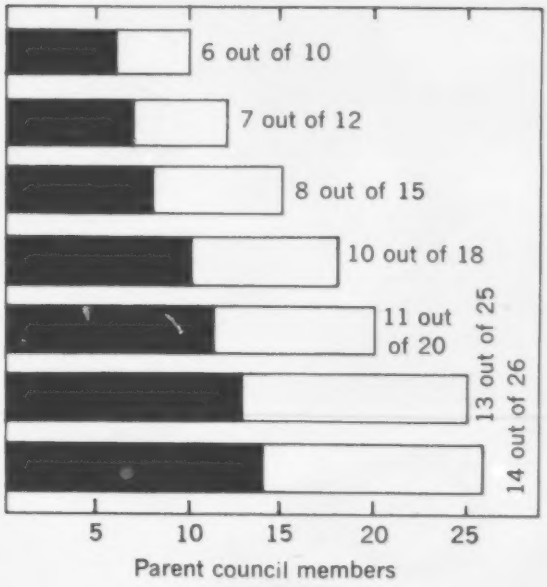
THE ROLE OF THE PARENT ADVISORY COUNCILS

This section discusses the parent advisory council from the viewpoint of the parents—what their rights and responsibilities are, what help they can expect from the local education agency, and what role the council should have in the title I program. Parents might also want to look at *Parental Involvement in Title I ESEA*, a publication of the Office of Education (OE) specifically written to help local and State officials understand and implement the Federal requirements for parent councils.

Public Law 93-380, also referred to as the Education Amendments of 1974, requires that each school district with a title I program establish two types of councils: a parent advisory council for the entire district (districtwide council) and one for each school participating in a title I project. *All* council members must be selected by parents. Parents living in an eligible attendance area are entitled to participate in the selection of council members. This includes parents of children attending nonpublic schools. Although the law uses the term local education agency (LEA), this book usually refers to LEA as school districts. The law requires that the school districts recognize the councils as the group for advising it in the planning, implementation, and evaluation of title I projects.

One of the important provisions is the one requiring that the council be made up of a majority of participating parents. Figure 2 illustrates the meaning of this phrase. For instance, if a council had 25 members, a majority is 13 parents of children participating in title I. The other provisions in the regulations will be discussed below as part of the duties of the council and duties of the local school district.

FIGURE 2.—Parent Council Membership: A Majority of Parents



Establishing Parent Advisory Councils

School districts which have already established advisory councils indicate there are six important components to consider: preparation, membership, training, organization, support, and evaluation.

Preparation simply means laying the groundwork for parental involvement. Some parents and other community members feel ill-at-ease in a school atmosphere; they are afraid to question the system or to make suggestions. Parent advisory councils cannot be successful in this type of atmosphere. Parents and school officials must prepare for increased parental involvement by improving school-home relationships, by helping teachers and administrators understand the positive effects of parental involvement, and by making parents feel more at home in the schools. Each school district and their title I parent council will find their own way of doing this. Spokane, Wash., organized 3-week conferences, bringing teachers and parents together for an exchange of ideas and worries. Other districts sponsor a series of speeches and discussions on parental involvement. These are all ways of paving the way for an advisory council.

The basic rule of membership is that parents of children participating in title I make up the majority of the council including parents of children enrolled in private schools. This means that their children must actually be receiving title I services in the current year's program or will receive service in the proposed program. Each member of an advisory council must live in the school district served by his or her council. Members of a school advisory council must live in the attendance area serving that school.

Federal regulations say council members must be selected by parents in eligible school attendance areas. Some school districts hold elections at each target area school, with a representative from each school serving on the intermediate and/or districtwide advisory council. Establishing parent advisory councils requires eligible people who are ready and willing to be organized. Here are some steps that can be followed in organizing parent advisory councils. The school district notifies participating parents that they are eligible to be considered for membership on the councils. Their consent is secured to be identified as participating parents.

The requirement of obtaining the parent's consent for participation on the parent advisory council can be met in a variety of ways. Schools could distribute consent notices individually to parents of students receiving Title I services, asking them for permission to release their names if they want to be considered for membership as part of the PAC. LEAs could also send or mail a notice to all parents in a Title I project school attendance area, announcing that parents whose children were actually participating or will be participating in Title I and who wanted to be considered for PAC membership should identify themselves by sending in a written consent or by attending a special meeting. Teachers of Title I students could explain the purposes of PACs and the requirement of written consent during parent-teacher visits or at other conference sessions. Local radio or television stations that broadcast information about community events could be requested to read a copy of a public service announcement about PAC selection and the need to obtain consent. Local newspapers can be asked to run stories about the program and the need for written consent in order to select PAC members.

The school district then invites parents in the school attendance area to an open house to hear an explana-

tion of title I. Plans for this meeting are developed with members of existing parent councils. These members should be certain that elections and/or selections are well publicized so other interested parents have an opportunity to participate. At this meeting a date can be set for the selection of council members.

Those attending the meeting on the designated date will select members to represent them on the parent advisory council. When this method does not produce an adequate number of parents, those members selected can begin recruiting other parents. In some instances, a recruitment committee is established. In other cases, parents share recruiting responsibility among members, each bringing new parents to the next meeting. The selection of alternate representatives at the time regular members are selected will help councils operate more smoothly. Following the selection of council members, school authorities will publish through the school paper, PTA meetings, or other channels the names of the council members so that all parents will know their representatives.

Training is an important ingredient in insuring the success of parent advisory councils. Federal regulations provide that title I funds may be used for training parent advisory council members. If parents are to really be involved in the planning, implementation, and evaluation of the title I program, they must know what they are doing. The title I councils, working with school district officials, should organize a training program for parent council members. Basic training should include discussions of the basic requirements for title I (Federal, State, and local), an examination of how the school district plans its title I programs and who is responsible for what aspects, and visits to title I projects. Council members might also need advice on organizing committees, making reports, conducting evaluations, and holding elections. The training should be a continuous process. Council members should ask for help when they need it, and school officials should watch for areas where council members may need more information or an opportunity to question someone about information they don't understand.

The organization of parent advisory councils is entirely up to the council members. Robert's Rules of Order describes a number of organizational structures. At a minimum, council members will probably want to choose a chairman, assistant chairman, secretary, and parliamentarian. They may also want to appoint a committee chairman to deal with specific tasks or problem areas.

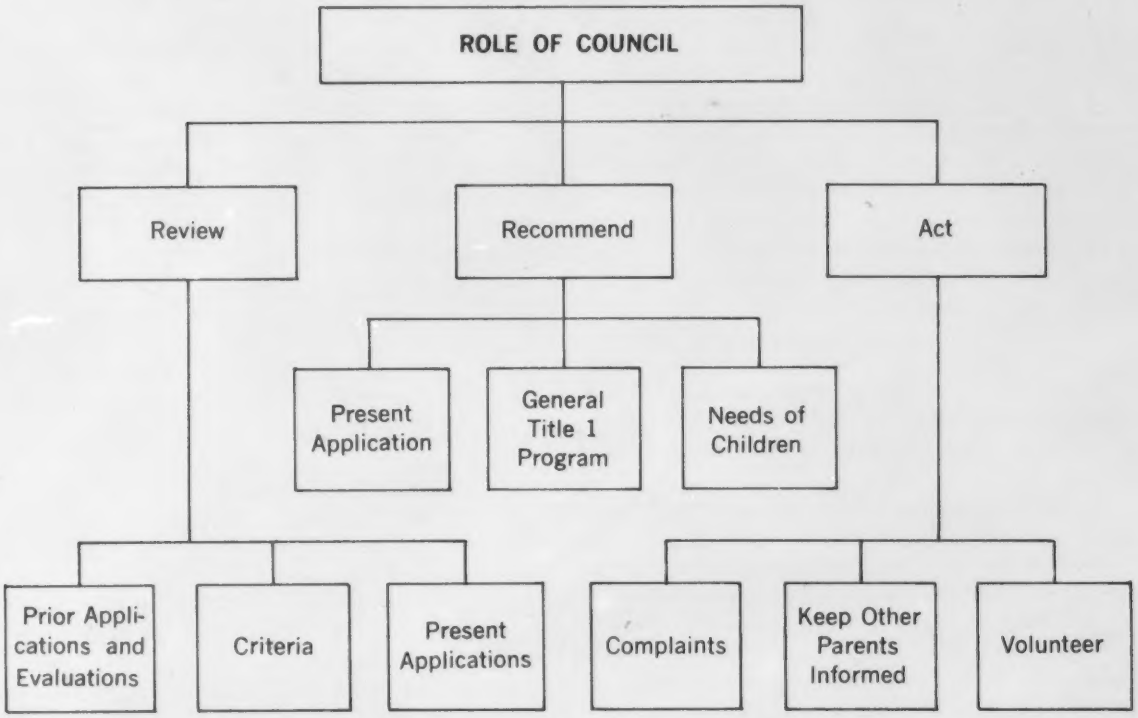
The best support the school district can give parent councils is information, both written and verbal. The section on the duties of the school district lists the information which council members must be given, but it would be helpful for them to have other data. For instance, the school superintendent or a member of his staff should brief council members on the structure and organization of the school system (which offices do what) and the overall school budget. In the case of school advisory councils, the principal or a member of his staff should explain how the school operates, identify the grade levels served and explain what services are provided. This is the only way the councils will understand how the title I program fits in with the regular school program and what priority title I has in the school and district. Council members should know how title I participants are selected, how many children receive title I services, what needs of eligible children are considered most important in planning the title I program, how personnel are hired, and what types of facilities and supplies are needed. In the city of Baltimore, Md., a library of title I information was set up in each title I school.

There are other types of support the council may need from the school district. It will need a convenient meeting place and the availability of school officials for answering questions, et cetera. The councils may need money to pay members' transportation costs, babysitting fees, or to buy supplies. Federal regulations provide that title I funds may be used to pay for such expenses. School officials should give the councils as much support as possible.

The last step to consider in establishing parent advisory councils is evaluation. Because parent advisory councils are a new requirement in title I, it is very important that their success—or failure—be evaluated. Some of the questions parents and school officials will want to answer in evaluating the effectiveness of parent councils include:

1. How were council members selected?
2. Did the council participate in the planning of the school and/or the district title I projects? Were council members' opinions and suggestions considered and acted upon?
3. What recommendations did the councils make about the school and/or district title I program? Were these recommendations included in the application sent to the State?
4. Do the councils have regularly scheduled meetings? Are the meetings well publicized in advance and open to the public?
5. Are parents other than council members given a chance to voice their opinions?

FIGURE 3.—Functions of a Parent Advisory Council



6. Do school officials brief the councils about future plans and changes in title I projects?

7. How are council members and other parents involved in the operations of the title I program?

8. Is there a training program for council members? What does it involve?

9. How effective are the councils in getting other parents involved in school activities?

10. What is the community response to the council?

If the councils have not been successful in meeting their goals, then evaluators should find out why. Did the councils receive enough support from school officials? Did council members ask for help when needed? Did school officials listen to the views of council members? Answering such questions will help educators and parents see the councils' strengths and weaknesses.

Duties of Parent Councils

The law and the regulations say that parent advisory councils must be involved in the planning, implementation, and evaluation of the title I program. This means that the councils are to be involved in every phase of the title I program. Neither the law nor the regulations spell out how this involvement should take place. The few specific functions of the parent councils mentioned in the regulations include:

1. To review applications and evaluations of past and present title I programs.

2. To make recommendations about the needs of eligible children and how these needs can be met.

3. To submit comments, if desired, to local school personnel and the State about the title I application.

Beyond these duties, the functions of the council should be decided jointly by members of the council and the local school administrators. Figure 3 illustrates the types of functions a council should assume.

The council should be particularly concerned with community relationships. In addition to acting as a go-between for other parents and citizens and the school administration, council members should encourage better school-home relationships. They should invite other parents and community members to visit title I activities; especially those which are successful should receive publicity.

To carry out their function, the PAC members must know the program well and keep abreast of how it is operating in each project. This requires a close working relationship between councils (school, intermediate, and district) and a coordination of their functions because their levels of involvement will differ. The school council is primarily concerned with the needs of its own building, although educational problems and solutions are not confined to any one school. Members of the building council should know the needs of other schools and the resources in the district as a whole. The intermediate council is concerned with title I projects in groups of schools, and the district council is interested in the title I program in the entire school district.

There are not sufficient funds to serve all students eligible for title I services. Title I funds must be spent at a limited number of eligible schools to assist a limited number of educationally deprived children in a school district. Although title I projects are designed locally to meet local conditions and the particular needs of disadvantaged students, the process of planning, implementing, and evaluating title I projects year-by-year can be described in general terms which fit all school systems. The councils will assist and provide advice to the local school district in developing a title I program. This process includes:

1. Identifying eligible schools
2. Conducting needs assessment
3. Ranking student's needs
4. Identifying students needing assistance
5. Concentrating funds in target schools
6. Designing programs
7. Implementing programs
8. Evaluating programs

Program development is an on-going process that includes a number of activities which overlap. For instance, most districts begin planning for the next year's program before the current title I program is completed. The councils should know the project design schedule and should be organized in a manner that would best facilitate the flow of information in your district.

The ways in which the parents are involved during the implementation or operational phase of the title I program vary, and depend to a large extent on the nature of the project, the interest and abilities of the parents, and the relationship between council members and school personnel. There are two major kinds of involvement that may be considered. One is to approach project operations in the role of an organized advisory group and the other is to engage in project activities as individuals providing direct help to students.

Organized advisory activities may include:

1. Working with teaching staff to plan special programs of interest to title I parents.

2. Visiting schools to observe how the project is operating. These visits will contribute to more informed decisions in designing and evaluating programs.

3. Recruiting volunteers to assist in school activities.

4. Organizing a follow-up committee to visit parents of students being served after they have been notified by the district that their child has been selected for the project. This committee may serve as the body for screening parents' views regarding the title I project.

The law and the regulations require that the school district annually evaluate the title I program. This evaluation must include objective measures that assess how well the title I project met the educational needs of the participants. Like project design, evaluation is an on-going process and can be affected by decisions made about program planning, implementation, and administration. Although the outcome of the evaluation normally takes place at the end of the project, evaluation design must be considered during the early stages of the planning process and continued throughout the operation of the title I program. Provisions should be built into the program that would allow frequent assessment of how well the instructional program is working for a given group of youngsters. Parent advisory council activities may include:

1. Reviewing past evaluations and reports.

2. Visiting projects and recording observations.

3. Assisting the school district in interpreting the evaluation report to the parent community.

4. Reviewing procedures and techniques to be used in making evaluation.

5. Commenting on plans for and results of evaluation of student progress.

If school officials and/or employees serve on the council, parents should be sure they do not dominate the council. If this should happen, the majority of the council—parents—should think about restricting school employees' council membership to nonvoting status. Even when a council is composed entirely of parents, it will want to invite school officials, representatives of business, civic, civil rights, religious, welfare, and social service organizations, and students to attend council meetings as observers and resource persons.

Duties of the Local School District

Local education agencies must support and cooperate with their title I parent advisory councils. In general, this means a school district must:

1. Provide any information *parents* may need to participate effectively in the planning, development, operation, and evaluation of the title I program.
2. Consider *parents'* views. Title I regulations specifically say that parents should have a chance to voice their opinions about the needs of educationally deprived children in title I target areas and about the title I application. Parents' viewpoints should be sent to the State along with the title I application.
3. Contact parents of participating children and secure their consent to be considered for council membership.
4. Establish procedures for nomination and selection of council members.
5. Establish a procedure for handling complaints from *parents* and other community members.
6. Provide the parent council with plans for developing future title I projects.
7. Describe in the project application how parents were involved in the planning of the project and develop plans for continuing their involvement.

To fulfill this last duty, a school district must provide each council, free of charge, with the following:

1. Title I laws
2. Federal regulations and guidelines about title I
3. State regulations and guidelines for title I

Each council must be provided:

1. Current and past title I applications
2. Current and past title I evaluations

School officials should also provide parent council members with any other information they may need to perform their duties.

In addition to these duties to *parents* in the entire school district, school officials must keep all parents—not just council members—in *each* project area aware of the title I services available to their children.

There are a number of national organizations knowledgeable about the title I program. Some of these organizations have worked very closely with parents, encouraging them to become more involved in the title I program in their school district. Some of the organizations that are willing to offer parents and community members additional suggestions about title I are:

1. The National Urban League
   55 East 52d St.
   New York, N.Y. 10022
2. The NAACP Legal Defense and Educational Fund
   10 Columbus Circle
   New York, N.Y. 10019
3. American Friends Service Committee
   51 Fairlie St., N.W.
   Atlanta, Ga. 30303
4. Lawyers' Committee for Civil Rights
   733 15th St., NW.
   Suite 520
   Washington, D.C. 20005
5. Harvard Center for Law and Education
   38 Kirkland St.
   Cambridge, Mass. 02138
6. The National Parent Center
   1341 G Street, NW.
   Suite 520
   Washington, D.C. 20002

How To File a Complaint

The first thing to remember about filing a complaint regarding title I is to try to avoid it. A complaint implies a lack of cooperation between parents and school officials. If parents are not satisfied with some aspects of the title I program, their first step is to talk to school administrators and program directors. They should ask for a hearing with the school and/or districtwide parent advisory council and/or school board to point out the program areas parents feel are ineffective, suggest alternatives, and ask for changes. Only when this course of action fails should a formal complaint be filed.

This should not stop parents from filing complaints, because a complaint can be very helpful in insuring that title I funds are being used in the best interests of educationally deprived children. Just filing a complaint can help focus attention on problem areas and encourage change.

A *complaint* usually deals with some violation of Federal or State title I regulations—the misuse of funds, inadequate needs assessment, failure to involve children from nonpublic schools, and so forth. If talks with local school administrators fail to solve such problems, parents can—and should—file a complaint. They should clearly state all the details in the case, including the school district's failure to act. Since the State department of education has the legal responsibility for monitoring local title I operations, the complaint should be sent to the State I coordinator. Table 2 lists the addresses and phone numbers of State title I Coordinators.

Regulations require that the State education agency establish procedures for investigating complaints.

These procedures must include the following:

1. Steps for resolving complaints.
2. Specific time limits for investigation and resolution of complaints (normally not to exceed 60 days).
3. An opportunity for the person(s) making the complaint to present evidence to the SEAs.
4. An announcement describing how the complaint procedure will operate. This information is to be circulated to parents, parent council members, and interested parties.

There are several ways the State title I coordinator can handle the complaint. He may ask the local superintendent of schools to hold a public hearing and to answer the complaint in writing. He may send a team of State title I staff members to investigate the complaint and file a report.

Parents may file a complaint with the Division of Education for the Disadvantaged, Seventh & D Streets SW., Washington, D.C. 20202. Federal officials will then request the State to investigate and respond within 30 days. The Office of Education will not identify the complainant. It is the responsibility of State title I coordinators to resolve complaints. In some instances the Office of Education will visit the site, review situations, and report on complaints. A written report will be submitted to the complainant.

TABLE 2.—State ESEA Title I Coordinators

ALABAMA
Coordinator of Title I, ESEA
State Department of Education
State Office Building, Room 460
Montgomery, Alabama 36104
Phone: (205) 832-3290

ALASKA
Coordinator, Title I, ESEA
State Department of Education
326 Alaska Office Building
Juneau, Alaska 99801
Phone: 8-399-0150
ask for Juneau 465-2883

ARIZONA
Education Program Director
ESEA, Title I
State Department of Education
1535 W. Jefferson Street
Phoenix, Arizona 85007
Phone: (602) 271-5235

ARKANSAS
Coordinator of Title I, ESEA
Department of Education
Arch Ford Education Building
Little Rock, Arkansas 72201
Phone: (501) 371-1186

CALIFORNIA
Assistant Superintendent and
Director of Compensatory Education
State Department of Education
721 Capitol Mall
Sacramento, California 95814
Phone: (916) 445-2590

COLORADO
Director, Title I, ESEA
State Department of Education
State Office Building
Denver, Colorado 80203
Phone: (303) 892-2234

CONNECTICUT
Coordinator of Title I, ESEA
State Department of Education
P.O. Box 2219
Hartford, Connecticut 06115
Phone: (203) 566-3826

DELAWARE
State Supervisor, ESEA, Title I
State Department of
Public Instruction
The Townsend Building
Dover, Delaware 19901
Phone: (302) 678-4667

DISTRICT OF COLUMBIA
ESEA, Title I Coordinator
Public Schools of the District of Columbia
415 12th Street, N.W.
Washington, D.C. 20004
Phone: (202) 724-4261

FLORIDA
Coordinator, Compensatory Education
Department of Education
EX. 11
Tallahassee, Florida 32304
Phone: (904) 488-3575

GEORGIA
Director, Title I, ESEA
State Department of Education
State Office Building, Room 316
Atlanta, Georgia 30334
Phone: (404) 656-2436

HAWAII
Administrator, Compensatory Education
State Department of Education
P.O. Box 2360
Honolulu, Hawaii 96804
Phone: 8-415-556-0220
ask operator for Honolulu
telephone number: 548-2211

IDAHO
Director, Title I, ESEA
State Department of Education
Len B. Jordan Office Building
650 West State Street
Boise, Idaho 83720
Phone: (208) 384-2195

ILLINOIS
Director, Title I, ESEA
Illinois Office of Education
100 North First Street
Springfield, Illinois 62777
Phone: (217) 782-6036

INDIANA
Director, Division of Compensatory Ed.
State Department of Public Instruction
Room 501, ISTA Building
150 West Market Street
Indianapolis, Indiana 46204
Phone: (317) 633-4436

IOWA
Chief of Title I, ESEA
Department of Public Instruction
Grimes Office Building
Des Moines, Iowa 50319
Phone: (515) 281-5313

KANSAS
Director of Title I, ESEA
State Department of Education
120 East 10th Street
Topeka, Kansas 66612
Phone: (913) 296-3161

KENTUCKY
Director, Division of
Compensatory Education
State Department of Education
West Frankfort Office Complex
U.S. Highway 127, South
Frankfort, Kentucky 40601
Phone: (502) 564-3301

LOUISIANA
Coordinator of Title I, ESEA
State Department of Education
Baton Rouge, Louisiana 70804
Phone: (504) 389-5291

MAINE
Coordinator of Title I, ESEA
State Department of Educational and
Cultural Services
Education Building
Augusta, Maine 04330
Phone: (207) 289-3541

MARYLAND
Coordinator of Title I, ESEA
State Department of Education
Baltimore-Washington International Airport
P.O. Box 8717
Baltimore, Maryland 21240
Phone: (301) 796-8300, ext. 230

MASSACHUSETTS
Director of Title I, ESEA
State Department of Education
31 St. James Avenue (5th Floor)
Boston, Massachusetts 02116
Phone: (617) 727-5745

MICHIGAN
Coordinator of Title I, ESEA
State Department of Education
P.O. Box 420
Lansing, Michigan 48902
Phone: (517) 373-3851

MINNESOTA
Coordinator of Title I, ESEA
State Department of Education
Capitol Square, 550 Cedar Street
St. Paul, Minnesota 55101
Phone: (612) 296-2181

MISSISSIPPI
Coordinator, Title I, ESEA
State Department of Education
P.O. Box 771
Jackson, Mississippi 39205
Phone: (601) 354-6944

MISSOURI
Director, Title I, ESEA
Department of Elementary and
Secondary Education
P.O. Box 480
Jefferson City, Missouri 65101
Phone: (314) 751-2643

MONTANA
Manager, Division of ESEA, Title I
Office of the State Superintendent
of Public Instruction
Helena, Montana 59601
Phone: (406) 449-2410

NEBRASKA
Director, Title I, ESEA
State Department of Education
233 South Tenth Street
Lincoln, Nebraska 68508
Phone: (402) 471-2481

NEVADA
Title I Consultant
Nevada Department of Education
400 West King Street, Capitol Complex
Carson City, Nevada 89701
Phone: (702) 885-5700 x 245

NEW HAMPSHIRE
Coordinator, Title I, ESEA
Division of Instruction
State Department of Education
64 North Main Street
Concord, New Hampshire 03301
Phone: (603) 271-2717

NEW JERSEY
Coordinator, Title I, ESEA
State Department of Education
225 West State Street
Trenton, New Jersey 08625
Phone: (609) 292-8360

NEW MEXICO
Director of Title I, ESEA
State Department of Education
Santa Fe, New Mexico 87501
Phone: (505) 827-5267

NEW YORK
Director, Division of Federal
Education Opportunity Programs
State Education Department
Albany, New York 12224
Phone: (518) 474-1144

NORTH CAROLINA
Director of Compensatory Education
State Department of Public Instruction
Raleigh, North Carolina 27611
Phone: (919) 733-7665

NORTH DAKOTA
Coordinator of Title I, ESEA
State Department of Public Instruction
State Capitol Building
Bismarck, North Dakota 58501
Phone: (701) 224-2282

OHIO
Coordinator of Title I, ESEA
State Department of Education
933 High Street
Worthington, Ohio 43085
Phone: (614) 466-4161, 4164, 8904, 8907

OKLAHOMA
Administrator, Compensatory Education
State Department of Education
Oklahoma City, Oklahoma 73105
Phone: (405) 521-2846

OREGON
Coordinator, Title I, ESEA
State Department of Education
Salem, Oregon 97310
Phone: (503) 378-3606

PENNSYLVANIA
Chief of Compensatory Programs
Bureau of Special and
Compensatory Education
State Department of Education
P.O. Box 911
Harrisburg, Pennsylvania 17126
Phone: (717) 787-7135, 7136 or 7137

RHODE ISLAND
Coordinator, Compensatory Education
State Department of Education
Roger Williams Building
Hayes Street
Providence, Rhode Island 02908
Phone: (401) 277-2681

SOUTH CAROLINA
Coordinator of Title I, ESEA
State Department of Education
Rutledge Building, Room 201
Columbia, South Carolina 29201
Phone: (803) 758-3471

SOUTH DAKOTA
Coordinator of Title I, ESEA
Division of Elementary and
Secondary Education
Pierre, South Dakota 57501
Phone: (605) 224-3218 or 3219

TENNESSEE
Director of Compensatory Education
State Department of Education
221 Cordell Hull Building
Nashville, Tennessee 37219
Phone: (615) 741-3665

TEXAS
Director of Federal Funding
Texas Education Agency
201 East 11th Street
Austin, Texas 78701
Phone: (512) 475-4126

UTAH
Director, Title I, ESEA
State Board of Education
250 East 5th South Street
Salt Lake City, Utah 84111
Phone: (801) 533-5061

VERMONT
Chief, Compensatory Education
State Department of Education
State Office Building
Montpelier, Vermont 05602
Phone: (802) 828-3124

VIRGINIA
Coordinator of Title I, ESEA
State Department of Education
Box Q
Richmond, Virginia 23216
Phone: (804) 786-3177, 3178, or 3179

WASHINGTON
Assistant Superintendent
Office of the Superintendent
of Public Instruction
Old Capitol Building
Olympia, Washington 98504
Phone: (206) 753-2695

WEST VIRGINIA
Director of Compensatory Education
State Department of Education
Building No. 6, Rm. 252
Charleston, West Virginia 25305
Phone: (304) 348-2702 or 3368

WISCONSIN
Administrator, Title I, ESEA
State Department of Public Instruction
126 Langdon Street
Madison, Wisconsin 53702
Phone: (608) 266-2699

WYOMING
Coordinator, Program Services for the
Educationally Disadvantaged
State Department of Education
Hathaway Building
Cheyenne, Wyoming 82002
Phone: (307) 777-7416

AMERICAN SAMOA
Federal Coordinator
Department of Education
Pago Pago, American Samoa 96799
Phone: 9-0 Overseas Operator 2435

GUAM
Administrator, Federal Programs
Department of Education
P.O. Box DE
Agana, Guam 96910
Phone: 9-0 Overseas Operator 72-785

PUERTO RICO
State Title I Coordinator
Department of Education
Hato Rey, Puerto Rico 00919
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Title I Chief
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TABLE 3.--Nonpublic School Representatives for ESEA Title I

UNITED STATES CATHOLIC CONFERENCE
Assistant Director for
Governmental Programs, Division of
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United States Catholic Conference
1312 Massachusetts Avenue, N.W.
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Phone: (202) 659-6656

COUNCIL FOR AMERICAN PRIVATE EDUCATION
Executive Director
Council for American Private Education
1625 Eye Street, N.W., Suite 1010
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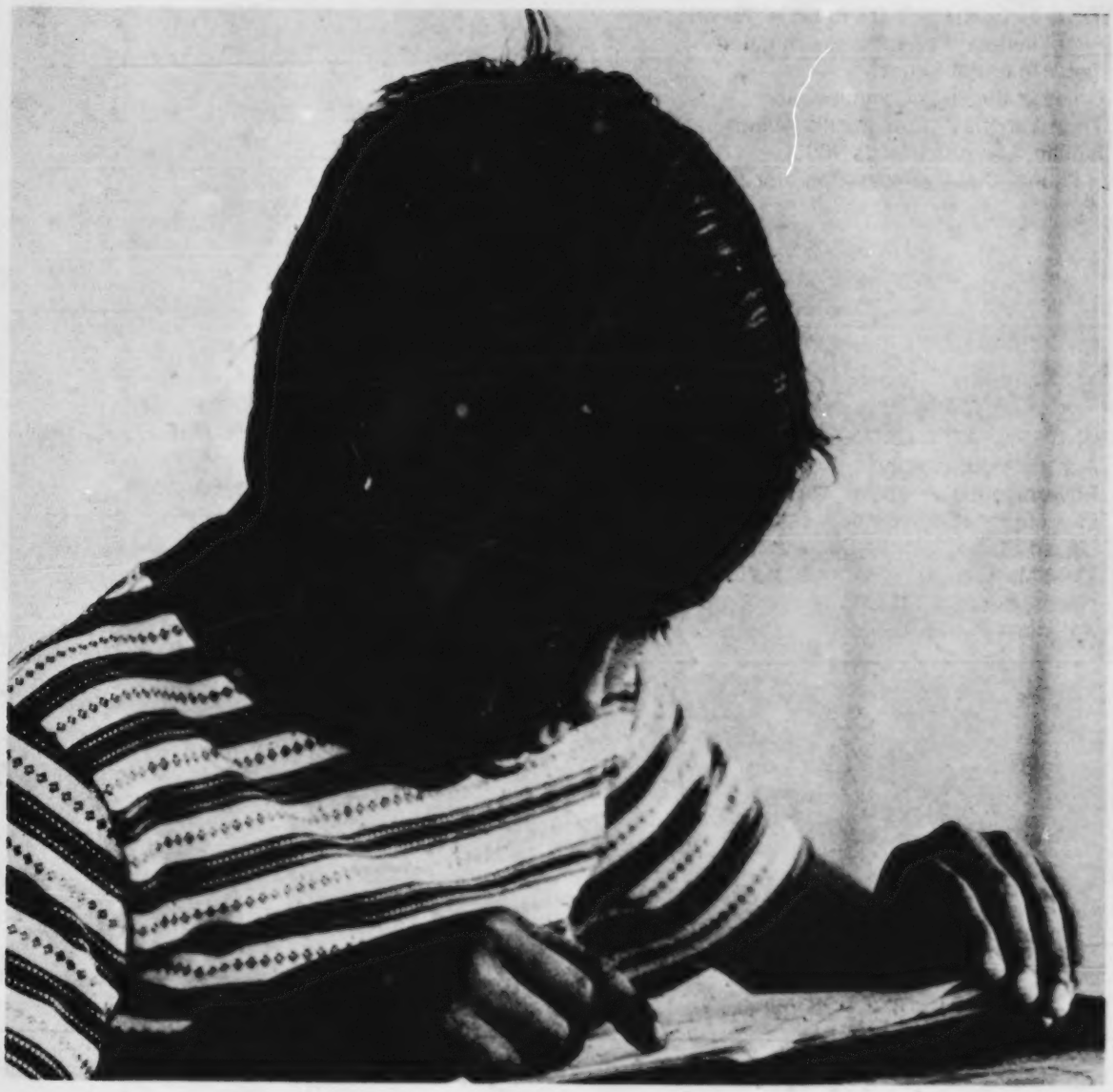
Phone: (202) 659-3236

PART III



What Are the Local School District's Responsibilities Under Title I ESEA?

Title I is often described as a federally financed, State-administered, and locally operated program. The next three chapters discuss this division of authority. The Federal Government pays the bills for title I and, thus, to protect its money makes sure its rules are followed. The State education agency oversees all title I operations in the State, making sure that participating local school districts follow all title I rules. But it is the local school district which is primarily responsible for the actual planning, operation, and evaluation of its own title I program. And, since parents are closer to the local school district than to the State or Federal Government, it is at this level that it will be easiest for them to see if title I is working as it should.

As part of its responsibilities under title I, the local education agency must:

1. Identify the educationally deprived children in low-income areas of the school district and determine their special needs. (See pages 12-16.)
2. Select eligible attendance areas and from these project areas. (See page 56.)
3. Design and implement projects, in accordance with title I regulations and program guides, to meet the educational needs of children. (See pages 3-8.)
4. Coordinate title I with other compensatory education projects in the school district.
5. Submit an application to the State education agency. (See page 10.)
6. Maintain fiscal effort with respect to total current expenditures in project areas, being sure they are comparable to nonproject areas. (See the comparability section on pages 8-10.)
7. Involve parents in the planning, implementation, and evaluation of the title I program. (See pages 21-32.)
8. Maintain fiscal records of all title I money spent and report to the State on the use of these funds.
9. Make information on title I projects available to parents and the public.
10. Evaluate the local title I program.

Many of these responsibilities were discussed in earlier chapters. Therefore, this chapter will concentrate on the local school district's tasks in relation to informing the public about the title I program and evaluating the program.

KEEPING EVERYONE INFORMED ABOUT TITLE I

Title I uses the phrase "disseminating information" when it talks about letting people know about title I. Disseminating means spreading, so *disseminating information* really just means getting the word out about title I.

There are several groups who need to know about title I, and the law includes separate provisions for each of these groups:

1. *The State education agency (SEA).*—The law says the local school district must submit an annual report and any other reports the SEA may require on the district's title I activities. This information may include achievement levels of students participating in the title I program. The State needs these reports to fulfill its own reporting requirements for the Office of Education (See page 42).

2. *Parents and the general public.*—The law requires that the local school district make title I applications and "all pertinent documents related thereto" available to parents and the general public. It also specifies that all evaluation reports are public information; that is, any interested citizen has a right to see these reports.

3. *Teachers and other educators.* — The school district must see that teachers and administrators are kept informed of new and/or successful educational research, demonstration, and other projects. The results of these projects should be used in planning or revising title I activities within the district.

Use this space to describe the organizational structure of your local school district and where title I fits in. List the name, address, and phone number for each person having authority over title I activities.

Usually most school districts see to it that the State education agency and their own employees get all the information they need to function effectively. But a problem sometimes arises in keeping parents and the general public informed about title I activities. The general public means anyone or everyone who wants information; it may include parents or it may be a citizen with no children in school; it may be a news reporter or a student studying school district policies in relation to title I. Any of these people has a right to know about title I.

In general there are four kinds of information available about title I:

1. The basic requirements of title I and how the program works. This would include information on title I laws, Federal and State requirements for title I, and examples of successful title I programs.

2. The school district's own title I program. This would include the needs assessment done to determine the priority needs of eligible children, the district's title I application, its hiring and training policies for staff members, and plans for how the title I program will actually operate.

3. The district's old title I programs. This information will give the public a comparison for determining how effective the present title I program may be. Information about old programs should include explanations of successes or failures.

4. Evaluations of past and present title I activities.

The only records with information from these four categories which school district officials may refuse to let outsiders see are achievement records which include student and/or teacher names. A parent may see his own child's test scores, but no one else has a right to this information. The school district must provide anyone who asks with a general indication of how well children did on tests, et cetera, but it may not release test scores which correspond to student or teacher names. School officials may also choose to keep incomplete reports private. This is a legitimate delay if figures are being verified or a posttesting done for comparison purposes. Members of the general public should ask when the information will be available and request it again. Any information submitted to the State as part of a title I report should automatically become available to the public.

The law simply says that the general public must have access to the information. This means the school district must let any interested person read the information. If the person wants a copy of any particular report or document, the school district may charge him for the cost of reproduction.

Parent advisory councils must be given copies of title I reports free of charge.

A school district committed to making sure that both parents and the general public know about its title I program will start its own dissemination activities, rather than waiting for parents or others to request information. The school district may issue press releases, send flyers explaining title I services and activities to homes in eligible attendance areas, arrange for speakers at parents' and community meetings, and publish information especially designed to help the general public understand title I. Parents should encourage officials in their school district to start a positive public information program which will keep the community informed about title I and other school activities. Such a program helps prevent misunderstandings and encourages greater community participation in the title I program.

EVALUATING TITLE I PROJECTS

An *evaluation* is simply determining the success or failure of a project. Many people feel an evaluation is something educators are concerned with only *after* a project is completed. Actually, the evaluation is part of the initial planning process for a project and continues throughout the project's operation.

There are two types of evaluations—process evaluation and product evaluation. Process evaluation is the type of evaluation conducted the entire time the project is in operation: it determines if the project is operating as it should; that is, is it following title I rules, is it serving the limited number of children chosen to participate in the project, are all the children getting the services they should, and so forth. Product evaluation, on the other hand, takes place at the end of a project; it determines how successfully the project has met predetermined objectives; that is, whether the project did what it was supposed to.

The first step in the evaluation process—setting objectives—is also one of the primary steps in planning a title I program. Once a school district has chosen target areas and conducted a needs assessment of educationally deprived children in those areas, then it is ready to say what it wants to accomplish in its title I program. This is called setting objectives, and it must be done before the actual activities which will make up a title I program can be planned. For instance, it would be silly to plan a title I program based on a reading lab where children can improve their reading skills if you later decide the objective for the title I pro-

gram, according to the children's needs, should be to improve their math skills.

The original legislation for title I required that "effective procedures, including provision for appropriate objective measurements of educational achievement, will be adopted for evaluating at least annually the effectiveness of the programs in meeting the special educational needs of educationally deprived children." Because title I evaluation reports were too often not specific enough to give any indication of whether any academic progress occurred, the Congress passed an amendment to title I in 1970 which required the inclusion of performance objectives in title I applications. A *performance objective* is a statement of what the title I program is intended to accomplish in specific, measureable terms. The law now says: "the LEA will make an annual report relating to performance in accordance with specific performance criteria related to program objectives to enable the SEA to perform its duties, including information relating to the educational achievement of students participating in title I . . ."

A performance objective should answer the questions, who, what, how much, and when—who should accomplish something, what should be accomplished, how much should be accomplished, and when will the accomplishment be measured. As an example, take the following performance objective:

> 75 percent of fifth-grade, title I students testing 2 or more years below grade level will increase in reading achievement by 1.5 years as measured by "X" test by May 30.

The objective answers all four questions: who—75 percent of fifth-grade title I students testing 2 or more years below grade level; what—increase reading achievement; how much—1.5 years on "X" test; and when—by May 30.

Separate objectives must be written for each project and for each behavioral outcome anticipated as part of a district's title I program. For instance, if a district's title I program includes a remedial reading project, a teacher-training program, field trips to improve students' self-image, and an English-as-a-Second-Language project for Spanish-speaking children, separate objectives must be written for each project. The objectives for the reading project will probably be expressed in terms of growth rates on pretests and posttests. The objectives for the teacher training and field trips will be more difficult to set because there are no standardized tests to judge the effectiveness of such activities. For teacher training, depending on the type of training offered, the objective may be to increase the number of times a teacher uses the classroom aide for instructional assistance to students. The objective for the field trips, with the intended behavioral outcome of improving students' knowledge, may be to expose students to five different job categories.

The performance objectives are the basis for the evaluation design. The evaluation is the measurement of how well these objectives have been reached. It helps determine a program's effectiveness in improving student achievement and provides data to identify successful activities and reject ineffective ones.

There are six essential elements in an evaluation design.

1. *Participants.*—An evaluation should consider the effect of a project on all participating students, but in a school district where thousands of children are involved in a single project, it may be impossible to gather data on all these children. In such cases, the evaluation will be based on a sampling; that is, a small portion of the participants. Parents should be sure the sampling is representative of the total number of children; in other words, if nonpublic school children participated in the project, the evaluation sampling should include some nonpublic school children. If the project involved first, second, and third graders, the sampling should include some children from each grade level. Some evaluation designs will require the use of a control group. A control group is a group of children with similar characteristics to the children in the project but who are not receiving the extra help the project offers.

2. *Objectives.*—See the preceding explanation.

3. *Measuring devices.*—The evaluation design should explain how success or failure in meeting the objectives will be measured. In measuring academic progress, the most common procedures used are pretests and posttests. These are tests given to children at the beginning (pre) and end (post) of a program. Parents should be sure that the pretests and posttests are from the same source so results are truly comparable. It is also important to see that measuring devices do not discriminate against any children. For instance, if a school district has a large Spanish-speaking student population, perhaps tests should be administered in Spanish. Parents should question school officials about how measuring devices were chosen to be sure the devices are fair.

4. *Data analysis.*—Most evaluations produce statistical information which must be interpreted by experts before parents and the general public can understand its meaning. Parents should be sure evaluation results are presented in understandable terms so they can judge the success or failure of the program for themselves.

5. *Conclusions.* — An analysis of the data will lead to certain conclusions about how well the project met its objectives. These conclusions usually form the basis for the evaluation report.

6. *Recommendations.* — An evaluation should not end with the submission of a report on the conclusions based on an analysis of test data. The conclusions and the data upon which they are based should be used to make recommendations for program improvements, expansion, or revision. For instance, if data indicates that a remedial reading program improved the reading achievement of second and third graders but had no real impact on the progress of first graders, evaluators might recommend that supplementary reading instruction at the first-grade level concentrate on reading readiness rather than remedial reading.

Title I requires that parents be involved in the evaluation, as well as in the planning and operation, of title I projects. This is why parents should be sure they understand their district's evaluation procedures and, if they don't, ask questions about them.

An evaluation is like a report card on the title I program. If the evaluation shows that the program did not fulfill the objectives set, then the program needs to be revised. Perhaps standards were set too high. Perhaps too many children were involved. Whatever the reason, a negative evaluation report demands some changes before a similar project should be funded. On the other hand, a favorable evaluation report can mean one of two things: the project was so successful that help in this area is no longer needed; or the project successfully met the needs of a small group of children and, based on this success, should be expanded to include more children the next year.

What Are the State's Responsibilities Under Title I ESEA?

The State has two distinct types of responsibilities in relation to the title I program. The first is very much like the duties of the local school district discussed in the previous chapter. For statewide title I programs—like those planned for migrant children—the State acts as a local education agency, planning, operating, and evaluating the program.

The State education agency has different obligations toward the local title I programs. The State is the liaison or go-between for the Office of Education and local school districts with title I programs. The State receives all title I funds and then divides them among eligible districts; it approves, improves, or rejects local title I applications; it oversees all title I operations within the State.

Among the specific duties of the State education agency according to title I law and regulations are:

1. Administer the statewide title I program.
2. Apply for funds, plan, operate, and evaluate statewide title I programs for migrant children, children in State institutions for the neglected or delinquent, and handicapped children. (See pages 12-14 and 51.)
3. Apply for incentive grants if eligible. (See page 51.)
4. Approve or reject local title I applications on the basis of their following title I regulations.
5. Divide basic title I grant money among local school districts. (See page 50.)
6. Assist local school officials in the development of title I projects.
7. Monitor local title I projects.
8. Submit assurances to the Office of Eduation that title I regulations are being followed in the State.
9. Establish procedures for investigating complaints.
10. Maintain fiscal records of all grant funds.
11. Compile reports as needed, based on information gathered from local school districts, to submit to the Office of Education.
12. Investigate complaints about local title I activities and report back to the complainant.

The State education agency's duties in regard to statewide title I programs have been discussed rather completely already. It is important to remember that for these programs, the State has the same evaluation and dissemination responsibilities as the local school district has toward its title I program.

This chapter concentrates on the State's responsibilities for overseeing local title I operations.

APPROVING TITLE I APPLICATIONS

The section on page 10 discussed title I applications—what they must contain and what information parents should be able to find out by reading an application. The State education agency receives an application from each local school district planning a title I program. It must decide whether or not to approve the application.

The law includes specific points that the State must look for in determining whether a school district's application may be approved. These are:

1. The project must be designed to meet the special educational needs of educationally deprived children in school attendance areas with high concentrations of children from low-income families, and the project must be of sufficient size, scope, and quality to show some promise of success.
2. Educationally deprived children from nonpublic schools who live in eligible attendance areas must have a chance to participate in the project.
3. The school district must control all funds and own all property purchased with title I money. Title I moneys will be used to supplement and not supplant State and local funds.
4. Any project involving construction must fit in with the overall State plans for the construction of school facilities. All facilities must be designed so they can be used by handicapped persons.

5. Applications which include funds for planning purposes must prove that the money is necessary because of the unusual nature of the project or because the school district does not have the resources necessary for proper planning. The planning must be directly related to the title I program.

6. The school district must have an effective evaluation plan, including the use of objective measurements of academic achievement.

7. The school district must submit at least an annual report and any other reports that may be required to the State to enable the State to evaluate the statewide title I effort.

8. The application and other title I documents, including evaluations, must be available to parents and the general public.

9. Teachers and administrators should receive information about educational research and projects that will help them plan and/or operate a better title I program.

10. Projects involving construction must consider the excellence of building design and the inclusion of works of arts in the building.

11. Professional staff members and aides should be trained together.

12. Parents must be involved in designing the title I program.

13. School districts must show that services provided with State and local money are comparable in title I and nontitle I schools.

Most of these points were discussed in some detail earlier in the text. They are repeated here as an indication of their importance in judging the legality of a title I project. If the State does not find evidence in the application that these points have been followed, then it cannot approve the district's title I application. This does not necessarily mean that the application is rejected. The State education agency will always try to work with local school officials to help them revise their application and conform to title I law and regulations. Even if an application is not approved, the school district has a right to request a hearing on the rejection.

The points listed above are not the only things the State looks for in a title I application. The State may also question how a school district planned its project – was the needs assessment adequate, were parents consulted, was the project limited to those children most in need of help. These are all important considerations in reviewing a title I application.

Parents should remember that they can have a great impact on the State's action in regard to a schools district's title I application. The local school district must attach the comments of the advisory council and other parents in submitting the application to the State. State officials will examine these comments carefully, not only as a means of seeing how successfully the school district involved parents in its planning of the title I program but also as a means of assessing the extent to which title I guidelines have been followed.

MONITORING AND ASSISTING LOCAL SCHOOL DISTRICTS

The use of Federal funds – or any public moneys for that matter – demands some sort of monitoring so taxpayers can be sure their taxes are being properly spent.

In case of title I, monitoring occurs at two levels; the U.S. Office of Education monitors statewide title I programs and, in a few instances, also examines local projects; the State education agency is responsible for monitoring local title I operations. Monitoring can include any number of activities. In a sense the examination of an application is monitoring, that is, checking to see that everything is in line with predetermined criteria. Studying reports submitted by another agency is another form of monitoring. However, the most effective way of monitoring is through onsite visits.

The U.S. Office of Education has published a booklet for State staff members entitled "Conducting Onsite Visits," which explains the importance of and the techniques to be used in an onsite visit. Parents, especially members of district advisory councils, will want to get a copy of this booklet to better understand the monitoring function. The booklet will also help parents realize things they should be looking for in observing title I activities within their own school districts.

An *onsite visit* is simply a trip to the place where a project is actually operating. Such a visit can have several purposes: to monitor, to offer assistance, or to identify good program practices. When the purpose of a visit is to monitor local title I activities, State staff members will be looking for three things:

1. If the local school district has followed all Federal and State guidelines in regard to title I. This is sometimes called *compliance*.

2. If title I activities in the district are the same as those described in the application.

3. How good the title I program is.

If the onsite visit is general, that is, if it was not arranged to deal with a specific problem area, then the monitors will consider at least the following items: target area selection, comparability, parental involvement, private school involvement, needs assessment,

project objectives, instructional program development, project implementation, evaluation, financial management, dissemination activities, and handling of complaints. Some onsite visits will concentrate on only one or several of these items, perhaps in answer to a complaint or to clarify the district's application or evaluation.

To be successful, an onsite visit must be well planned. The State education agency should arrange the visit at a time convenient for the school district superintendent and his staff. The local staff should be told the purpose(s) of the visit, how it will be conducted, and the names of State personnel who will visit. Local and State staff members should arrange an agenda well in advance of the scheduled visit; this insures that knowledgeable personnel are available when monitors need questions answered.

The school district should make sure that not only administrators but also teachers, aides, parents (especially members of the advisory council), and even children are free to talk with the visiting State employees. The school district should also analyze its own title I activities prior to the visit. This will remind all staff members of the details of the project and where there are problem areas, if any, making them more able to answer questions effectively.

The visit itself should begin with a meeting between the State monitoring team and the administrative local staff, including the superintendent. This meeting is sometimes called an *entrance conference*. The purposes of the visit should be discussed at the meeting and any changes in the agenda should be made so all participants know exactly what the agenda is. Ordinarily the State team will begin its actual monitoring by reviewing administrative procedures for title I with project personnel. This may involve an examination of some records and conversations with district administrators; the school district should be prepared to supply State staff members with any information they may request. Then the monitoring team will visit actual project sites, seeing the project in action and talking with teachers, aides, and parents about the project. The onsite visit should end with another joint meeting of State and local staff members at which time the State personnel should present their preliminary findings and recommendations.

The actual onsite visit should be followed by a formal report, sent to the district superintendent, that lists the findings and recommendations of the State team. The State should offer the local school district help in solving any problems and should be sure that the recommendations of the monitoring team are put into effect. The superintendent should see that title I staff members, the parent advisory council, and any other persons who participated in the onsite visit receive copies of the State team's report.

The second and third types of onsite visits—those designed to offer technical assistance to a school district or to identify good projects—are often the direct results of a monitoring visit. If the monitoring team found few problem areas and discovered that the project was improving student achievement, it may recommend that the project be publicized throughout the State as a good example of a successful title I project. This would mean that writers from the State education agency would return to the school district to gather more information for publication—how the project was planned, how it was implemented, what the evaluation results are. On the other hand, if the monitoring team found many problems in the local title I program, it can suggest as part of its final report, that various specialists on the State staff visit the school district to help solve the problems. For instance, a State auditor might be able to help local staff members set up an accounting system to keep better track of title I funds. A bilingual education specialist could help local planners design a program for Spanish-speaking children. An evaluation expert might help local staff members design special tests directly related to the title I program. All these are forms of *technical assistance;* that is, help provided by experts for a specific purpose. States, with their largest staffs, must provide as much technical assistance as possible to local school districts, just as the Office of Education has an obligation to provide technical assistance to States when needed.

PROVIDING ASSURANCES TO OE

Because the State education agency has the responsibility of seeing that local school districts follow title I rules, it must promise the Office of Education certain conditions are being met throughout the State. The law says each State must provide three assurances:

1. Title I funds will be used only for projects approved by the State which comply with all Federal rules, especially those listed on pages 3-10.

2. The State will have an accounting system to see that title I funds are properly distributed and accounted for.

3. The State will submit periodic evaluation reports and any other reports that may be required to the Office of Education.

What Are the Federal Government's Responsibilities Under Title I ESEA?

The General Education Provisions Act of 1970, which amended parts of the Elementary and Secondary Education Act, includes a provision forbidding the Federal Government to interfere in the operations of local schools. The law says: "No provisions . . . shall be construed to authorize any department, agency, officer, or employee of the United States to exercise any direction, supervision, or control over the curriculum, program of instruction, administration, or personnel of any educational institution, school, or school system, or over the selection of library resources, textbooks, or other printed or published instructional materials by any educational institution or school system, or to require the assignment or transportation of students or teachers in order to overcome racial imbalance." This clause does not prohibit the Federal Government from enforcing criteria which the law authorizes the U.S. Commissioner of Education to establish.

Congress required the Office of Education, through the Commissioner, to see that title I funds were properly spent.

This chapter outlines some of the specific duties of the Federal Government in regard to title I. Although many of these tasks are the responsibility of the Office of Education, other Federal agencies are also involved in title I. The Bureau of the Census, part of the U.S. Department of Commerce, must provide the Commissioner with data needed to determine the number of children eligible for title I. The Bureau of Indian Affairs in the U.S. Department of the Interior acts as a State education agency in administering the title I program for Indian students in schools under the Bureau's jurisdiction.

All Federal agencies serving deprived children in low-income areas must provide the Commissioner with information he may need to make title I more effective. However, this chapter deals primarily with the functions of the Commissioner himself and the Office of Education.

ORGANIZATION OF THE OFFICE OF EDUCATION

Like most Federal agencies, the organizational structure of the Office of Education changes frequently. The Office includes special units for Teacher Corps, the Right-To-Read program, the Indian Education program, and program planning and evaluation. It also has bureaus responsible for occupational and adult education, postsecondary education, and programs for the handicapped. For the parents of title I children, the Office's most important unit is its Bureau of Elementary and Secondary Education.

This Bureau includes the Division of Education for the Disadvantaged, which is directly responsible for title I at the Federal level. It also oversees the Follow Through and many other elementary and secondary school programs that receive Federal assistance.

The Division of Education for the Disadvantaged (DED) has several branches. The Migrant Education Branch oversees all migrant education projects financed under title I. The Program Support Branch provides help to State and local education agencies and parents in planning and operating better title I programs. Its staff includes specialists in parental involvement, dissemination, evaluation, nonpublic schools, and in several other important areas.

The Program Services Branch develops and prepares title I policy directives and provides interpretation and guidance on how title I requirements should be carried out. The Program Operations Branch determines that State educational agencies, local school districts, and institutions for neglected or delinquent children maintain compliance with the law and the Federal regulations. The Operations Branch consists of five sections (Northeast, Northwest, Mid-Southwest, Southeast, and Western). Each section covers a geographic area averaging 10 States. Each has a small staff to monitor State and local title I programs in the respective regions, respond to parents' and citizens' complaints about title I, and assist school of-

ficials in meeting title I requirements. Parents should know the name, address, and telephone number for the branch covering their State. If the local title I office cannot provide parents with this information, they should write to their State title I office or to the Division of Education for the Disadvantaged, U.S. Office of Education, Washington, D.C. 20202.

FEDERAL RESPONSIBILITIES FOR TITLE I

The Elementary and Secondary Education Act and its amendments include the following tasks as the responsibilities of the Commissioner of Education and/or the Office of Education:

1. Determine the funding allocation for eligible counties, State education agencies, outlying territories, and the Bureau of Indian Affairs in the U.S. Department of the Interior. This responsibility was discussed in part II.
2. Approve applications from State education agencies for statewide title I programs.
3. Withhold funds from any State education agency which fails to fulfill its obligations under title I.
4. Develop and disseminate regulations, program guides, and other materials affecting the administration of title I.
5. Monitor State and local title I programs.
6. Provide technical assistance to State education agencies and, with State approval, to local school districts.
7. Require parental involvement in programs which would benefit from it. This was discussed more fully in part II.
8. Inform the public about federally supported education programs.
9. Compile fiscal, statistical, and program reports evaluating the effectiveness of title I for submission to Congress and use by the general public.

Approving or Not Accepting Title I Applications

Local school districts submit their title I applications to the State education agency, not the Office of Education. Federal title I staff members may ask to see a local application during an onsite visit or to clarify any questions about the title I program in any school district. Parents also have a right to see these applications.

But the Office of Education *must* receive an application for any statewide title I program. This is particularly important for migrant education programs. To approve a title I application for migrant education the Commissioner must be satisfied that the State education agency:

1. Will use all title I money for programs and projects designed to meet the special educational needs of migrant children.
2. Coordinated its program with similar programs in other States, including the exchange of school and health records for migrant students.

For the general title I program the State must assure the Commissioner that:

1. Title I money will be used only for projects specifically approved by the State education agency which meet all Federal requirements.
2. It will maintain adequate financial records to account for the expenditure of Federal funds.
3. It will submit periodic (usually annual) reports evaluating the effectiveness of the State title I program and any other reports the Office of Education may require.

The Commissioner may withhold title I funds from any State which does not meet these requirements. Before an application can be rejected, however, the State education agency must have adequate notice and be given the opportunity for a hearing.

Federal Rules Governing Title I

The Elementary and Secondary Education Act and its amendments include the legal requirements for title I. However, some of these legal requirements need to be further explained to be practical. And the law also includes a number of references to additional requirements which the Commissioner may set.

The Office of Education uses two means of informing State and local school officials of Federal requirements for title I—regulations and program directives. Parents will want to be familiar with all these to fully understand the title I program.

New *regulations* are usually published for title I soon after any amendments to the law are passed; the regulations explain the amendments, putting them into practical terms. All regulations must be published in the *Federal Register*. They become effective 30 days after publication. The LEA must provide the parent advisory council with copies of these regulations.

Although the Office of Education has issued more than 70 program directives (formerly called program guides) about title I, only 10 to 20 of these are active at any one time. The *program directives* are policy statements sent to the Chief State School Officer of

each State; he is responsible for seeing that the information is passed on to local school officials. Many of the program directives deal with financial and survey information applicable only for the fiscal year in which they are issued. Others become outdated as new directives are issued. Each local school district should have a complete file of title I program guides and directives. Parents may want to look through this file to understand the history of title I and how present policies developed.

Overseeing State and Local Title I Programs

Items 5 and 6 at the beginning of this chapter dealt with the Federal Government's responsibility to oversee State and local title I programs. Staff members of the operations sections monitor these programs by visiting each State at least once a year. During such a visit Federal employees examine State title I records, talk with State education officials, and visit several title I projects within the State. They review their findings with the State title I coordinator and his staff, offering assistance to overcome any problems they may have found. In addition, specialists from the Division of Education for the Disadvantaged's Program Support Branch are also available to help. Staff members from this branch conduct periodic workshops in different parts of the country to keep State and local title I staff members up to date about title I rules and policies.

Part of the monitoring of title I programs involves fiscal audits conducted by the U.S. Department of Health, Education, and Welfare, of which the Office of Education is a part. Each State is audited about once every 3 to 4 years. An *audit* is primarily concerned with financial records to insure that title I funds have been properly spent. Parents should find out when the latest audit in their State took place and what the results of that audit were.

Publishing Information About Title I

Just as each State must submit an annual report about its title I program to the Office of Education, the Office itself must give Congress a report once a year about the title I program nationwide. Congress may also require other reports. For instance, in 1972 the Office of Education had to submit a report on how funds were allocated under title I, including an evaluation of how well States divided their title I money among local school districts and how well local districts selected project areas. All these reports become public information once they are submitted to Congress.

In addition to these required reports, the Office of Education publishes a wide variety of materials to help educators and interested citizens know more about title I. Among the books parents may want to have a copy of are:

1. *Questions and Answers: Programs for Educationally Deprived Children Under ESEA Title I.* — This envelope-size booklet contains about 70 questions and answers about the local title I program. It deals with the eligibility of school districts, children, and projects, applications for funds, allocation of funds, and records and reports required by title I.

2. *Questions and Answers: Migrant Children Under ESEA Title I.* — Using the same format as #1, this booklet answers commonly asked questions about the title I program for migrant children.

3. *Questions and Answers: Neglected and Delinquent Children Under ESEA Title I.* — This booklet deals with the title I program for children in State or local institutions for the neglected or delinquent.

4. *Compilation of Legislation on Title I.* — This book puts together the original legislation and all the amendments for title I.

5. *Parental Involvement in Title I ESEA.* — This is a handbook for local school officials explaining the history of, the need for, and ways of implementing a strong parental involvement program.

6. *Working Together.* — Case studies of Title I ESEA Program in Four Desegregated School Districts: Berkeley, Calif.; Hillsborough County, Fla.; Moore County, N.C., and Searcy, Ark. All four studies examine not only the desegregation plans of each district but also the compensatory education program sponsored under title I of the Elementary and Secondary Education Act.

7. *Educational Programs That Work.* — This book describes exemplary educational programs that were developed by the local school districts. The document contains descriptions of title I projects as well as programs funded through other Federal sources. This book may serve as a resource for program ideas. It provides a concise review of programs that are already successfully meeting the challenges of providing high-quality educational opportunities for learners of various ages.

Other booklets dealing with title I have been mentioned elsewhere in this book. In addition, the Depart-

ment of Health, Education, and Welfare publishes many general education booklets which may be of interest to parents. These include annual statistical reports on the status of public education, projections of educational statistics for the next decade, and general summaries of the types of programs financed by the Office of Education.

PART IV

How Does a School District Get Title I ESEA Funds?

Title I ESEA is a Federal aid to education program involving three levels of government. Some grants are for State-operated programs, others for local title I programs. Parents will be particularly concerned with the funding process for local programs.

The Division of Education, through its National Center for Education Statistics, figures out how much money each county will get according to how much money Congress has made available for title I programs. The amount Congress sets aside for title I each year is the *appropriation*.

Each State Education Agency (SEA) divides the county grants among school districts within each county. This process is called suballocation.

In some cases, school districts may also receive special grants under title I—incentive grants or grants to urban and rural areas with many poor children. Each school district must submit an application to the State explaining how its title I funds will be used.

This chapter explains these steps in detail.

In discussing the title I funding process, it is important to understand some commonly used words. Title I funds are appropriated each fiscal year. A *fiscal year* is not the same as the calendar year; it runs from October 1 to the following September 30, rather than from January 1 to December 31. The abbreviation *FY* stands for fiscal year.

SEA is an abbreviation for State education agency. Each State has an Office responsible for overseeing the use of title I funds and most other school programs. In different States, the SEA may be referred to as the *Department of Education*, or the *Department of Public Instruction*, or known by some other name.

LEA stands for local education agency, another name for a local school district. Although LEA is usually used in the law, this book most often uses the term local school district.

Other terms are explained within the context of the chapter.

DETERMINING COUNTY GRANTS

In determining the amount available for local title I programs, the law says the Commissioner of Education should compute basic grants for each county. Actually staff members of the National Center for Education Statistics, a part of the Division of Education, decide how much title I money each county is eligible to receive. They use data provided by the Census Bureau and other sources.

To receive title I funds a county must have at least 10 children in one or a combination of the following categories:

1. Children aged 5 to 17 from families with an annual income below the poverty level as determined by the Orshansky Index. The Orshansky Index is a formula used to identify poor families. In addition to family income the formula considers family size, whether a nonfarm or farm family is involved and the sex of the head of household. For example, the Orshansky formula poverty level figure worked out at approximately $3,750 for a nonfarm family of four at the time of the 1970 census. This figure is brought up to date each year, and for the same nonfarm family of four in 1976 the figure was $5,500.
2. Two-thirds of the children aged 5 to 17 from families receiving payments above the poverty level through Aid to Families with Dependent Children (AFDC).
3. Children in locally run institutions for neglected and delinquent.
4. Children in foster homes supported by public funds within the county.

This is the first step parents should look at to be sure their local school district is getting its fair share of title I funds. Be sure all eligible families are on the AFDC list. Figure 4 shows the total number of children in these four categories in fiscal year 1975.

To determine the maximum title I grant a county may receive, add up the number of children in the four categories: Multiply the sum by 40 percent of the State average per-pupil expenditure. If 32 percent of the national average per-pupil expenditure is higher than the previously calculated figure, then this higher figure will be used. If, however, the first figure (40% percent of the State average) is higher than 40 percent of the National average per-pupil expenditure, then the lower of these two figures will be used. Thus the current formula provides a floor for poor States and a ceiling for the wealthier ones. It is important to note that Public Law 93-380 specifies that no local school district will receive less than 85 percent of the prior year's allocation. The average per-pupil expenditure is the total amount spent on public elementary and secondary education in the State (or Nation) divided by the number of children in grades K-12 in the State (or Nation).

Title I funds are not sufficient to provide States with enough money to serve all children who are eligible to participate in the program. The amounts needed to serve all such children are ratably reduced according to the amount of title I money appropriated by Congress. Ratable reduction means that each county receives the same percentage of the money actually appropriated as it would receive if title I were fully funded.

SUBALLOCATING COUNTY FUNDS

Once the SEA is notified of its total grant for local title I programs, it divides the funds among eligible school districts in each county. To be eligible for title I funds, a school district must have at least 10 children in the 4 categories listed on page 49.

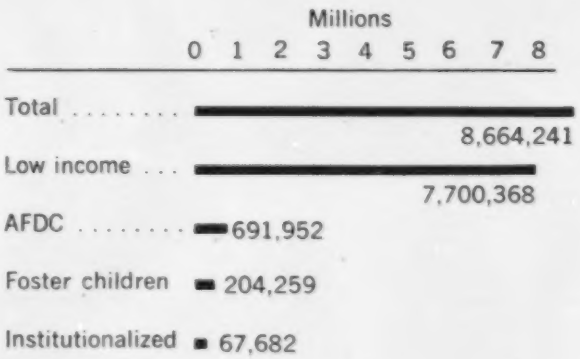
Eight States do not have to suballocate county grants because there is only one school district for each county in the State; i.e., where these boundaries are not the same, the money is divided according to the total number of children in the four categories on page 49. AFDC or census data indicating income figures are generally the best sources for determining the *current* distribution of such children, although other data sources may be more accurate in certain States. If more than one data source is used, more emphasis should be given to the most accurate source of information.

It is extremely important for parents to find out how the SEA suballocates funds and to determine whether the method used is the best indicator of how many needy children are in each school district.

Nearly half the States use both AFDC and census data to compute local grants. Some also use enrollment figures as a factor in determining title I grants.

Although an SEA may use different methods to suballocate funds in different counties, the method must be the same for all school districts within one county.

FIGURE 4.—Number of Children Counted in Determining Grants for Local School Districts Under Title I, Fiscal Year 1975



Use this space for recording the number of children in each category in your school district. Parents may get this information from local school officials.

Use the space below to describe the method your ESEA is using in dividing county grants among local school districts.

SPECIAL GRANTS FOR LOCAL SCHOOL DISTRICTS

The first type of grant is an incentive grant, available to States which do better than the national average in supporting public education. This average is called the *national effort index;* it is the sum of all non-Federal money spent on elementary and secondary education divided by the total personal income in the United States (or the State in figuring out the State-effort index). The U.S. Department of Commerce provides the statistics needed to figure out this ratio. A State may receive a maximum of $1 per eligible title I student for each one-hundredth of a percent by which it surpasses the national effort index.

In fiscal year 1975, $13,861,386 in title I funds were given as incentive grants to 22 States—Alaska, Colorado, Connecticut, Delaware, Iowa, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Montana, New Jersey, New Mexico, New York, Oregon, Pennsylvania, Utah, Vermont, Washington, Wisconsin, and Wyoming.

Eligible States must submit an application to the U.S. Office of Education explaining how the incentive grants will be distributed to local school districts. The law says school districts most in need of financial help should receive the money, and the Office of Education requires that a school district receiving an incentive grant have an effort index at least equal to that of the State and that the district be willing to use the money for an innovative title I project.

The second type of grant goes to urban and rural school districts with large numbers or a high percentage of poor children.

STATE TITLE I GRANTS

The original legislation for title I, Public Law 89-10, only approved funds for local title I programs and costs to the State education agency for administering the local programs. Later the law was amended to provide funds for State programs. These statewide programs were for specific groups of children—migrant children and children living in State institutions for the handicapped, neglected, or delinquent. The U.S. Department of the Interior (Bureau of Indian Affairs) also began receiving funds to operate title I programs on Indian reservations. The SEA may plan and administer some of these statewide programs in cooperation with some other State office, but it is the SEA which has the legal and financial responsibility for all title I activities.

The SEA may also use up to $150,000 or 1 percent, whichever is higher, of the State title I allocation to cover the costs of overseeing title I programs.

Table 4 gives a complete breakdown of all title I allotments for FY 1978. Both national and State figures are included.

TABLE 4.—U.S. Department of Health, Education, and Welfare, Office of Education Elementary and Secondary Education Act of 1965. P.L. 89-10 As Amended. Title I, Assistance for Educationally Deprived Children, Allotments for Fiscal Year 1978

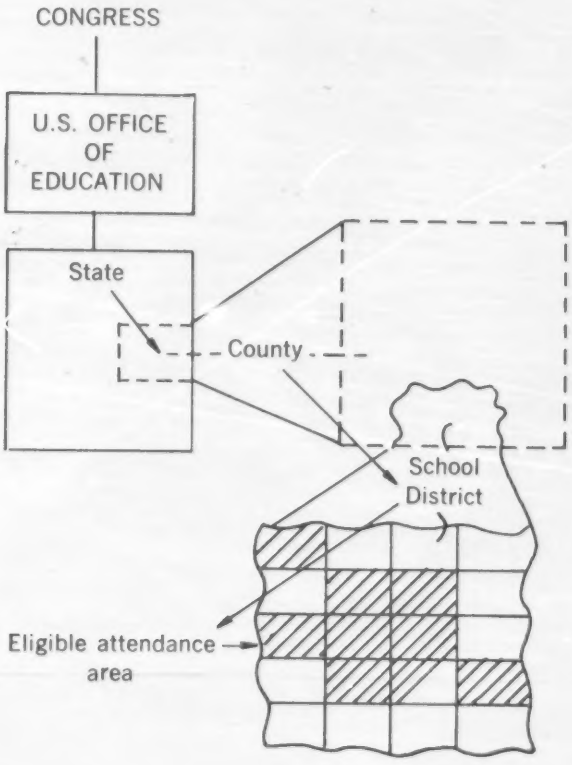
	Part A								Part B - $24,769,000		Grand Total	
	Local Educational Agencies	Handicapped	Juvenile Delinquents	Adult Correctional Institutions	Neglected	Migrant[1]	Administration	Total Part A	Special Incentive	Administration	Total Administration	
TOTALS	1,926,726,831	121,590,937	19,536,690	8,330,799	1,953,849	145,759,940	23,385,108	2,247,284,154	24,523,762	245,238	23,630,346	2,285,000,000
ALABAMA	51,055,361	656,016	199,129	39,363		711,306	526,612	53,187,787			526,612	53,187,787
ALASKA	3,592,305	1,491,880	86,993				148,658	5,319,836	134,231	1,342	150,000	5,455,409
ARIZONA	17,845,865	592,077	299,156	38,932		3,476,100	222,522	22,474,652	506,242	5,062	227,584	22,985,956
ARKANSAS	29,052,596	1,569,192	199,592	90,775		2,469,317	333,815	33,715,287			333,815	33,715,287
CALIFORNIA	156,938,183	3,263,228	1,448,082	280,885		30,755,669	1,926,860	194,612,907			1,926,860	194,612,907
COLORADO	16,717,627	1,803,081	166,347	25,249		1,792,685	205,050	20,710,039	148,197	1,482	206,532	20,859,718
CONNECTICUT	18,205,841	1,771,724	105,494	409,992	49,780	1,232,389	217,752	21,992,972	205,612	2,056	219,808	22,200,640
DELAWARE	4,930,482	1,083,644	158,130			315,216	148,851	6,636,323	114,917	1,149	150,000	6,752,389
FLORIDA	67,774,069	2,827,191	668,713	582,567		16,912,200	887,647	89,652,387			887,647	89,652,387
GEORGIA	55,154,220	977,421	485,318	289,237		1,237,567	581,438	58,725,201			581,438	58,725,201
HAWAII	6,017,521	426,088	48,047	15,840			150,000	6,657,496			150,000	6,657,496
IDAHO	4,575,247	239,469	59,739	32,830		2,354,857	150,000	7,412,142			150,000	7,412,142
ILLINOIS	93,599,568	12,627,763	568,153	114,874	120,981	990,413	1,080,218	109,101,970			1,080,218	109,101,970
INDIANA	25,325,919	2,617,820	282,485	233,526	179,679	1,004,406	296,438	29,940,273			296,438	29,940,273
IOWA	16,636,920	756,184	131,305	106,405	83,128	113,145	178,271	18,005,358			178,271	18,005,358
KANSAS	14,607,155	1,107,450	162,311	85,209		715,045	166,772	16,843,942			166,772	16,843,942
KENTUCKY	39,315,772	1,105,832	220,668	91,425		2,408,644	431,423	43,573,764			431,423	43,573,764
LOUISIANA	58,241,165	2,161,190	439,472	27,519		1,091,601	619,609	62,580,556			619,609	62,580,556
MAINE	7,368,455	730,816	129,202	46,180		1,591,957	143,963	10,010,573	603,747	6,037	150,000	10,620,357
MARYLAND	33,418,355	2,347,439	505,279	231,967		950,419	374,534	37,827,993	496,780	4,968	379,502	38,329,741
MASSACHUSETTS	38,152,384	8,706,953	382,486	261,184		1,620,710	491,237	49,614,954	3,339,593	33,396	524,633	52,987,943
MICHIGAN	76,974,514	7,354,557	338,026	718,304	16,432	4,668,979	900,708	90,971,520	3,678,564	36,786	937,494	94,686,870
MINNESOTA	28,857,204	785,650	319,131	190,938		1,122,358	312,753	31,588,034	3,599,578	35,996	348,749	35,223,608
MISSISSIPPI	48,724,008	657,016	250,069	94,334		2,051,669	517,771	52,294,867			517,771	52,294,867
MISSOURI	34,702,737	2,134,901	310,733	106,974		1,212,904	384,682	38,852,931			384,682	38,852,931
MONTANA	5,980,200	372,368	98,955	2,062		872,462	145,587	7,471,634	441,317	4,413	150,000	7,917,364
NEBRASKA	10,220,215	345,267	91,380	40,130	23,208	289,431	150,000	11,159,631			150,000	11,159,631
NEVADA	2,361,505	448,646	105,121	28,989		211,209	150,000	3,305,470			150,000	3,305,470
NEW HAMPSHIRE	3,098,215	677,470	84,282				150,000	4,009,967			150,000	4,009,967
NEW JERSEY	52,982,258	4,708,163	754,254	58,595		2,279,346	607,826	61,390,442	2,844,869	28,449	636,275	64,263,760
NEW MEXICO	15,260,973	394,923	137,075	36,722		2,427,294	182,570	18,439,557	25,665	257	182,827	18,465,479
NEW YORK	202,496,411	12,227,010	2,771,434	778,015		3,076,232	2,213,491	223,562,593	3,678,564	36,786	2,250,277	227,277,943
NORTH CAROLINA	59,094,099	3,295,736	773,823	475,828		3,204,876	668,444	67,512,806			668,444	67,512,806
NORTH DAKOTA	5,256,243	294,526	58,812	23,154		762,709	150,000	6,545,444			150,000	6,545,444
OHIO	57,263,893	6,175,712	884,390	167,891	131,981	1,516,620	661,405	66,801,892			661,405	66,801,892
OKLAHOMA	23,095,621	697,253	180,773	204,686	253,460	890,151	250,219	25,575,163			253,219	25,575,163
OREGON	16,761,835	2,134,130	486,381	114,308		2,757,109	222,538	22,476,301	815,535	8,155	230,693	23,299,991
PENNSYLVANIA	90,313,283	7,991,232	760,365	339,808	244,036	823,898	1,004,726	101,477,348	896,792	8,968	1,013,694	102,383,108
RHODE ISLAND	7,116,952	577,494	31,424	26,088	33,064		149,577	7,934,599	42,335	423	150,000	7,977,357
SOUTH CAROLINA	38,748,406	1,214,222	301,472	378,345	88,450	644,158	413,751	41,788,804			413,751	41,788,804
SOUTH DAKOTA	6,529,899	341,530	51,866	36,570		37,510	150,000	7,147,375			150,000	7,147,375
TENNESSEE	46,120,646	900,002	484,141	260,147	238,954	322,311	483,262	48,809,463			483,262	48,809,463
TEXAS	119,590,863	6,877,684	966,469	272,198	316,754	36,282,586	1,643,066	165,949,620			1,643,066	165,949,620
UTAH	6,253,813	474,165	106,974	7,873		263,961	148,606	7,255,392	139,413	1,394	150,000	7,396,199
VERMONT	3,337,602	1,168,670	63,443	10,680		80,861	144,202	4,805,458	579,795	5,798	150,000	5,391,051
VIRGINIA	45,260,963	2,318,117	549,688	398,257		778,917	493,059	49,799,001			493,059	49,799,001
WASHINGTON	21,665,483	1,550,461	367,179	162,713		5,189,569	289,354	29,224,759	191,036	1,910	291,264	29,417,705
WEST VIRGINIA	20,256,937	546,235	238,491	53,011	25,470	209,317	213,295	21,542,756			213,295	21,542,756
WISCONSIN	30,608,754	2,905,141	434,998	117,199		833,473	349,496	35,299,061	1,898,922	18,990	368,486	37,216,973
WYOMING	2,507,403	275,538	60,891	11,852		280,928	148,579	3,285,191	142,058	1,421	150,000	3,428,670
DIST. of COLUMBIA	11,455,443	1,820,182	285,835		148,472		150,000	13,859,932			150,000	13,859,932
PUERTO RICO	52,996,278	571,453	442,714	211,169		925,456	551,471	55,698,541			551,471	55,698,541
Outlying Areas & BIA	22,259,165	493,025					100,000	22,852,190			100,000	22,852,190
Evaluation & Studies												12,250,000
Adjustment												674,869
Undistributed												21,977

[1] $2.1 million of this amount is reserved for the Migrant Student Record Transfer System

What Schools Offer a Title I Program?

Figure 5 illustrates the process of getting title I funds from the Federal Government to local school districts. Congress appropriates the money. The U.S. Office of Education determines how much each eligible county will receive and sends the money for all the eligible counties in each State to the State education agency. Then the SEA divides each county's share among school districts within the county. This is the point at which the last chapter stopped.

FIGURE 5.—Getting Title I Funds to Local Schools



Once school districts know how much title I money they will get, they must decide which schools in the district will be project areas. A *project area* is an attendance area whose children will get title I services. An *attendance area* is the neighborhood from which a school gets its students. Most school districts assign children to certain schools on the basis of geographic boundaries. The area within the boundaries for each school is an attendance area. Under title I eligible *attendance areas* are those with more or a higher percentage of children from low-income families than the average attendance area in the school district has.

The process for selecting eligible attendance areas and project areas is one of the most difficult tasks in planning a title I program. Parents must be sure that school officials follow the right procedure in determining these areas.

The U.S. Office of Education published a handbook for local school officials describing this process. Every parent council should have a copy of the handboook entitled "Title I ESEA Selecting Target Areas."

There are eight steps involved in determining eligible attendance areas:

1. Decide what data are the best indicators of where poor children live.
2. Collect data.
3. Fit the data to school attendance areas.
4. Weigh multiple data sources.
5. Figure out the number and percentage of poor children in each area.
6. Rank the areas.
7. Figure out the percentage and average number of poor children in the district as a whole.
8. Select eligible attendance areas.

These steps are explained in this chapter.

DATA SOURCES

To find out which school attendance areas are eligible for title I, a school district needs two essential pieces of information – the total number of schoolage children living in the attendance area and the number or percentage of those children who come from poor families.

Most school districts will know how many children live in each attendance area. This number should include children attending nonpublic schools, dropouts, and children in institutions for the neglected or the delinquent.

The number of children who come from poor families is harder to determine. Title I is often referred to as a program for poor children, but there is no way of finding out if children are poor. Actually, the law talks about children from low-income families; that is, families with an annual income below the poverty level.

There are a number of ways of finding out how many low-income families live in different parts of a school district. The best sources are census and Aid to Families with Dependent Children (AFDC) data. A school district may use only one source of information or several in counting children from low-income families, but it must use the same data sources for all attendance areas.

Census Data

The U.S. Census Bureau conducts a national census every 10 years; this is called the Census of Population and Housing. The census includes a special calculation of poverty based on family size and income as well as data on ethnic groups, income levels, employment, housing, and numbers of children. The most useful information for a school district deciding which areas should receive title I services will be the number of families with incomes below $2,000, $3,000, and $4,000. Using this information, school officials can find out the number of children from low-income families by multiplying the number of children in an area by the percentage of low-income families. For instance, if there are 432 families and 1,350 children in an attendance area and the census indicates 108 families in the area have incomes below $2,000, then 25 percent of the families are poor. Multiply the 1,350 children by 25 percent and you get a total of 337½ poor children.

In rural areas of the country census data are gathered according to geographic areas known as *enumeration districts*. Because these districts often have the same boundaries as townships, the boundaries will probably coincide with school district lines.

This is not true in urban areas where census data are collected in larger blocks. There are 247 Standard Metropolitan Statistical Areas (SMSA's) in the country; the Census Bureau divides these areas into census tracts or blocks in reporting information about the areas. A *census block* is usually the same as a city block. A *census tract* is an area where an average of 4,000 people live. School district officials must ask the Census Bureau to take information gathered by census block and tract and apply it to school district boundaries or do this data application themselves. *Title I ESEA Selecting Target Areas* describes how census data can be determined for each attendance area.

AFDC Data

While census data probably give the most complete information about the location and number of low-income families, at the end of the 10 years for which the data are used the information will no longer be up to date. Therefore, it may be necessary for school officials to find more current figures in counting the number of poor children in each attendance area.

Since income levels and the number of children in the family determine whether or not a family receives AFDC, it is natural that the office in charge of AFDC, usually the city, county, or State welfare office, has facts and figures on the number of poor children in the school district. Some States make the number of AFDC children, by street address, available each year. School officials may need to take this AFDC data and apply it to school attendance areas; in some cases the welfare office may do this. *Title I ESEA Selecting Target Areas* describes this process.

The difficulty with AFDC data is that they do not include all families with low incomes. Some families may not have lived in the area long enough to qualify for AFDC help. Others may not wish to ask for help. Therefore, school officials should find some other way of counting poor families without AFDC aid and use this information along with the AFDC data.

Other Data Sources

Health, employment, food program, and parental survey data can also be helpful in determining the number of children in each attendance area. A parental survey, asking parents questions about family income and number of children, would probably be the easiest way to count poor children in a school district. But some parents may not want to answer such questions; they may not be able to answer them; or the answers may be incomplete or inaccurate. However, a

survey, particularly if it is done as part of a home visit by a teacher, can be helpful, especially in identifying low-income families who do not get AFDC payments. Title I parents can encourage other parents to cooperate with such a survey so all eligible children are counted.

Many health statistics, including infant mortality and the use of free clinics, reflect where poor families live. However, it is hard to relate this data to number of children so this information should be used only in combination with other data.

Because the free lunch program is for poor children, counting the number of children getting free lunch in each school is a good indication of the poor children in the school. But this figure is still incomplete. Many nonpublic schools do not have free lunch programs. Some public school children do not sign up for free lunches. Like all the above sources, free lunch statistics should be used with census or AFDC data to be sure they reflect an adequate number of poor children.

Weighing Data Sources

If more than one data source is used in determining the number of children from low-income families in each attendance area, school officials must evaluate the importance and reliability of each data source and give it a weight. Usually census and/or AFDC data will be given the greatest weight.

For instance, if a school district has a low-income, population which does not receive AFDC, it might use the following weights: AFDC – 80 percent; and free lunch – 20 percent. In a district which has had a sudden growth in the number of low-income families since the last census, the weights might be: census – 40 percent; AFDC – 40 percent; and free lunch – 20 percent.

When using different data sources, it is also important to be sure all sources deal with the same unit; for instance, number of children. In the first district described above, you would need the following statistics:

1. Total number of children aged 5 to 17.

2. Total number of children 5 to 17 in families receiving AFDC.

3. Total number of children who receive free lunch.

All data have been turned into number of children.

Use this space to describe the data sources your school district uses in determining the number of poor children in each attendance area. Record the weights assigned to each data source if more than one is used.

SELECTING ELIGIBLE ATTENDANCE AREAS

The last four steps listed on page 53 involve selecting eligible attendance areas.

The first thing to do is figure out the number and percentage of poor children in each attendance area within the school district. This is simpler if only one data source was used; if more than one source was used, multiply the number of children in each category by the weight percentage assigned to the data source and add the results.

It is necessary to figure out both numbers and percentages of poor children because there are two ways of determining which schools have the most poor children. For example, school A has 300 students and 120 of them are from low-income families. School B has 100 students and all of them are poor. Some educators and parents will look at these figures and say school A is the poorest because it has more poor children. Others will say school B needs more help because 100 percent of its enrollment are poor.

Title I guidelines say a school district may use either numbers or percentages of poor children to determine which schools are eligible for title I services.

Once the numbers and percentages for each attendance area are computed, school officials must rank the areas. Elementary and secondary school attendance areas may be ranked separately. Then they must figure out the average number of poor children for an attendance area within the district and the percentage of children from low-income families in the whole district.

These district averages and percentages are used to compare the figures for each attendance area. An attendance area with the same number or more children from low-income famili than the district average or with an equal or higher percentage of poor children is eligible for title I services. As an example, take a school district with eight attendance areas.

There are 4,600 children in the school district; 1,455 of them are poor. This means there is an average of 181.8 poor children for each attendance area. The percentage of poor children in the district is 31.6.

According to these figures, attendance areas C, D, E, G, and H are eligible for title I services based on percentages. Using numbers of poor children, areas A, D, E, and G are eligible. Areas D, E, and G are eligible using either method.

Six of the eight attendance areas are eligible according to at least one of the title I criteria, but not all of them will be selected as project areas.

Attendance area	Percentage of poor children	Number of poor children
A	20	200
B	20	160
C	40	100
D	75	300
E	40	320
F	10	50
G	33	200
H	50	125

SELECTING PROJECT AREAS

Although school officials may use either of two methods to select eligible attendance areas for title I, the actual number of project areas (areas where title I services are offered) cannot be more than the number of eligible areas according to only the number *or* percentage method of selection. In the aforementioned example, five areas were eligible according to percentages; four were eligible according to numbers of poor children. Thus, the school district may have no more than five project areas, even though there are six eligible areas.

There are three basic rules for selecting project areas:

1. An attendance area must have a higher number or percentage of children from low-income families than the district average.
2. No more attendance areas than either the percentage or numbers ranking alone would provide may be selected as project areas.
3. In most cases, no eligible attendance area should be skipped in selecting project areas. In the above example, this means you could not choose area C as an attendance area instead of area H because H has a higher percentage of poor children than C.

Using these three rules, the project areas for the sample school district would be:

Percentage method—C, D, E, G, H
Numbers method—A, D, E, G
Combination method—A, D, E, G, H

The other possible combination—A, C, D, E, G—would violate rule 3 by skipping H in favor of C.

In some cases the differences in eligible attendance areas selected using one method or the other will vary much more than in the example above. It is then up to

the local school district officials to decide whether it is more important to help children from an attendance area with perhaps a smaller number but a higher percentage of children from low-income families or to help areas with large numbers of poor children. Generally, school districts base their selection of project areas on the percentage basis. Parents should know what policy their school district follows.

If there is little difference in the percentage of poor children in attendance areas within the school district, the whole district may be a project area. This can be done only if the difference among attendance areas within the district is much less than the average difference within the State. For instance, a school district may have a difference of only 5 percent, with the percentage of poor children in its attendance areas ranging from 28 to 33 percent. Five other districts in the State have differences of 40, 25, 30, 15, and 60 percent; the average difference in the State is 34 percent, much higher than the district with only a 5-percent variance.

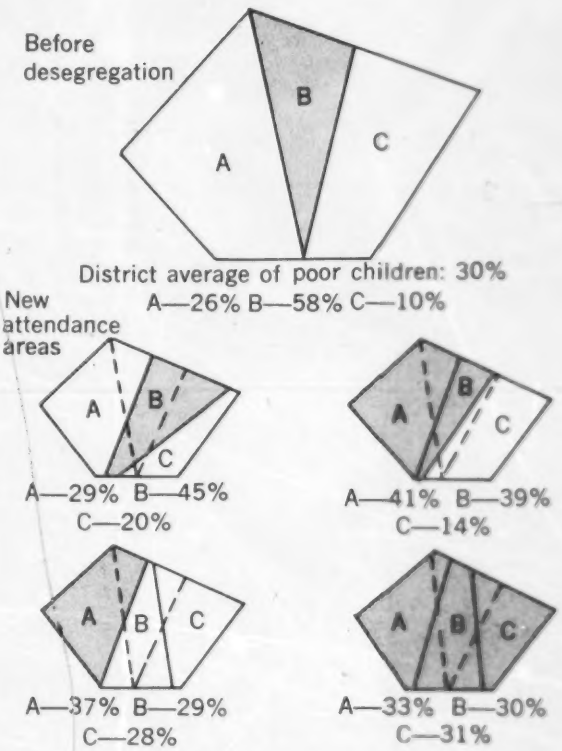
SELECTING TARGET AREAS IN DESEGREGATED DISTRICTS

Desegregation caused some problems in the selection of title I target areas in certain school districts. Since some school districts decided school attendance on the basis of race rather than geographic residence, schools rather than attendance areas became project areas. This type of segregation is no longer legal.

As school districts desegregated, some adopted freedom of choice plans which allowed students to choose the school they wished to attend. Title I was sometimes used to discourage children from changing schools; if they transferred, they would lose their title I services. To prevent this, the Federal Government approved a follow-the-child concept. This allowed a child who had been receiving title I services to get such help even if he transferred to a nontitle I school.

The follow-the-child concept is no longer legal in title I. Desegregated school districts must establish new attendance areas and include the change in attendance patterns in their title I application. The process of selecting target areas is then the same as for any other school district. Once new attendance area boundaries are set, school officials should rank the areas according to the number and percentage of poor children. Areas above the district average are eligible for title I. Figure 6 shows four ways of establishing new attendance area boundaries in a desegregated school district.

FIGURE 6.—Establishing New Attendance Area Boundaries in a Desegregated School District



Explanation: Solid areas are eligible attendance areas. Area within dotted lines is original eligible attendance area.

In some local school districts children residing in eligible attendance areas will be assigned in schools whose attendance areas are not eligible title I attendance areas; e.g., students voluntarily transferring from schools in which they are in a racial majority to schools in which they are in a racial minority. Educationally deprived children transferring under these circumstances are still eligible to receive title I services, and should have their needs assessed along with those of the other children residing within eligible areas.

If a school closes as part of a desegregation plan, the neighborhood served by the school becomes part of another school's attendance area. If, in order to meet desegregation orders, a school district establishes attendance areas where part of the area is separated from the other part, the number of children in the entire attendance area should be counted in determining eligibility for title I.

Parents should be sure that title I funds are not being used to promote segregation. On the other hand, they should check to see that the school district is not using title I funds to implement a desegregation plan. Children in title I programs should be chosen on the basis of educational need, not race.

Glossary

This glossary defines some of the words used throughout this book. Although most of the words are defined in the text the first time they appear, the glossary is an easy way to review these definitions when the words appear again.

1. **Aid to Families With Dependent Children.**—Often referred to as AFDC, or ADC, this program provides money to families who do not earn enough to support their children. The amount of AFDC money granted depends on the number of children in the family and the family's income. State AFDC plans are approved under title IV of the Social Security Act.
2. **Allocation**—An allocation is the amount of money actually set aside for a State or local school district under title I. (See also Appropriation and Authorization.)
3. **Application**—An application is a legal document submitted by the local school district to the State Department of Education for approval. In the case of the title I migrant program the application is submitted by the State to the U.S. Office of Education (USOE). The application describes the district's or State's project. It must include a description of each component making up the title I project, a detailed budget, an evaluation plan, and various assurances that all title I rules have been followed.
4. **Appropriation**—An appropriation is the amount of money made available by the Congress of the United States to support a national program.
5. **Attendance Area**—An attendance area is the geographic area served by a particular school.
6. **Audit**—A review of records and documents to determine that the program or project is operating properly, that required obligations have been recorded and all procedures relating to spending of money have been maintained.
7. **Authorization**—The maximum allowable amount which Congress could appropriate for title I according to the formula in the law is called the authorization.
8. **Average Daily Attendance**—Average daily attendance is the average number of children in school each day. Every State has its own way of computing average daily attendance. Some States include students who were only in school for a half day while others do not; some include preschool children, others do not.
9. **Average Per-Pupil Expenditure**—Average per-pupil expenditure is the total amount of State and local money spent on public elementary and secondary education in the State (or Nation) divided by the number of children in public elementary and secondary schools in the State (or Nation).
10. **Census**—The census is a population and housing survey conducted by the Bureau of the Census, U.S. Department of Commerce, once every 10 years. A new law provides that census data will be conducted every 5 years beginning in 1980. It provides statistics on family income and number of children. This information is used to determine where large numbers of low-income children live.
11. **Comparability**—For title I, comparability means that students in title I schools receive as many services (though they need not be the same) from State and local funds as students in non-title I schools.
12. **Compliance**—Compliance means having followed all the rules for title I.
13. **Concentration**—Concentration means limiting the use of title I funds to the children who have the greatest educational need.
14. **County**—A county is a geographic political subdivision within a State. Counties in most States include several school districts.

15. **Educationally Deprived Child**—An educationally deprived child is one who is behind in school. He is not doing the schoolwork expected of children his age because of economic, social, language, or cultural problems.

16. **Effort Index**—The effort index is the amount of all non-Federal money spent on public elementary and secondary education in a State (or Nation) divided by the total personal income in the State (or Nation).

17. **Elementary and Secondary Education Act (ESEA)**—This act (Public Law 89-10), passed in 1965, included provisions under title I to fund projects to help educationally deprived children. Other titles are used to expand school library services, and fund new kinds of education programs. Later amendments provided for bilingual education and dropout prevention programs.

18. **Fiscal Year**—The fiscal year is October 1 to September 30. (For example, October 1, 1977 to September 30, 1978, is fiscal year 1978.)

19. **Grant**—A grant is the amount of money given to an agency for a particular purpose. Under title I, a grant is given to a State or local education agency to provide special educational services for educationally deprived children in low-income areas when its project application has been approved. The grant cannot be more than the allocation.

20. **Local Education Agency**—For title I, local education agency (LEA) means a board of education or some other legal authority having administrative control over public education in a county, township, or school district.

21. **Low-Income Factor**—The low-income factor is the amount of money a family can earn annually in order for children in that family to be counted in finding out how many children are eligible for title I services. This is used only at the national level for making allocations under the formula prescribed in the law.

22. **Maintenance of Effort**—Maintenance of effort means that the State or local school district must continue to support public elementary and secondary schools within the State (or district) to the same extent or better than it did before title I funds were available.

23. **Migrant Child**—A migrant child is one whose parent or guardian is a migratory agricultural worker or migratory fisherman who crosses school district boundaries during the year. A migrant child may cross district boundaries within the same State (intrastate) or between several States (interstate), so he attends school in more than one school district during the year.

24. **Monitoring**—Monitoring means checking or overseeing to be sure everything is all right or, in the case of title I, that project application and project operations follow Federal and State rules.

25. **Needs Assessment**—A needs assessment is a study of a child's educational problems and how they can be solved.

26. **Onsite Visit**—An onsite visit is a trip to a project location. It may have several purposes—to monitor, to provide technical assistance, or to identify good practices.

27. **Program**—A title I program is all the projects in a school district or State.

28. **Project**—A project is a set of activities designed to correct a specific educational problem of a limited number of educationally deprived children.

29. **Ratable Reduction**—Ratable reduction is the process of giving each State and county its fair share of title I funds by giving them the same percentage they would be eligible to receive if the program were funded at its full authorization.

30. **Regulations**—Regulations are rules for title I. Federal regulations must be published in the *Federal Register* and become effective 30 days after publication. They usually explain or expand on some part of the law. States may also issue rules and procedures for title I, as long as they do not conflict with Federal regulations and law.

31. **State Education Agency**—State education agency (SEA) refers to the officer or office responsible for supervising public secondary and elementary education in the State.

32. **Suballocation**—Suballocation is the way by which a State education agency divides title I funds allocated to each eligible county in the State among school districts within each county.

33. **Supplant**—Supplant means to replace or to be used instead of. Title I funds may not be used to supplant State or local funds for education.

34. **Supplement**—Supplement means to add to. Title I funds should supplement State and local funds

for education of a special group of children identified under the title I requirements.

35. **Supportive Services**—Supportive services are noninstructional activities needed to achieve the educational goals of a title I program. Such services might include medical and dental care, transportation, counseling, and food.

36. **Target Areas**—Title I target areas are local attendance areas with a higher number or percentage of children from low-income families than the school district average for all attendance areas.

37. **Technical Assistance**—Technical assistance is expert help.

38. **Title I ESEA**—Title I ESEA is the largest Federal aid to education program. It provides monies to State and local education agencies to finance special educational programs for educationally deprived children in areas with many low-income families and for Indian, migrant, and institutionalized children.

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